

***CITY OF ROCKS NATIONAL RESERVE***

**Almo, Idaho**

**CLIMBING MANAGEMENT PLAN  
and  
FINDING OF NO SIGNIFICANT IMPACT**



**MARCH 1998**

**FINDING OF NO SIGNIFICANT IMPACT  
and  
DECISION NOTICE**

Project Name: Climbing Management Plan  
Park: City of Rocks National Reserve

**Project Description**

The City of Rocks National Reserve (CIRO) Climbing Management Plan was prepared to determine: (1) the appropriate level and type of climbing practices within the Reserve; (2) what types and levels of impacts associated with climbing in different areas of the Reserve are acceptable and do not impair Reserve resources or result in derogation of Reserve values; (3) what climbing practices should be used and are appropriate within the Reserve; and (4) what levels and kinds of mitigating management actions are necessary to assure a sustainable range of compatible climbing opportunities with long-term protection of the Reserve's natural and cultural resources and retention of a high quality visitor experience.

Based on the findings of the Twin Sisters Resource Study and consultation with the Idaho State Historic Preservation Office (SHPO) and the Advisory Council on Historic Preservation (ACHP), a recommendation to close the Twin Sisters to all but incidental recreational uses not directly associated with the access or enjoyment and interpretation of the California Trail was incorporated into the proposed action in the CIRO Comprehensive Management Plan (CMP). The February 5, 1996, Record of Decision for the CMP/Environmental Impact Statement deferred the decision concerning whether or not to retain that closure until the Climbing Management Plan was completed.

The Draft Climbing Management Plan and Environmental Assessment was completed and distributed for a 90-day public review period in July, 1995. Under 36 CFR 800 implementing regulations of Section 106 of the National Historic Preservation Act, copies of the Draft climbing plan/EA were also sent to the SHPO and ACHP. Other than the Twin Sisters climbing issue, there were no other major concerns expressed by the public regarding the preferred alternative. The National Park Service, in coordination with the Idaho Department of Parks and Recreation conducted additional consultations with the SHPO and ACHP during this period regarding the closure of the Twin Sisters to recreational climbing use. This consultation continued well beyond the public review period for the document. Additionally, subsequent discussions were held on the Twin Sisters issue with climbing and historical interest groups, and additional opportunities for input were provided. Final recommendations from the ACHP were received by the National Park Service on March 6, 1997. The ACHP concurred with the preferred alternative recommendation that the California Trail management subzone, including the Twin Sisters formation, be closed to climbing and other significant recreation use as proposed in the CIRO Comprehensive Management Plan. This is consistent with the preferred alternative of the Draft Climbing Management Plan.

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The four alternatives considered in the Draft Climbing Management Plan are:

Alternative A - Temporary Restrictions (No Action) Alternative -- Climbing in the Reserve would be managed as it was prior to the initiation of any resource monitoring or management programs established to address the long-term mitigation of climbing impacts. Mitigation of impacts would be done on a site- or area-specific basis. Temporary restrictions would be applied only when and where climbing-related impacts became apparent, regardless of management zones in the Reserve. Climbing on Twin Sisters would be restricted to weekdays when there is little visitation to the historic corridor of the Reserve. Climbing would also be temporarily prohibited during historic commemorative events.

Alternative B - Permit System Alternative -- A permit system for climbing activities at City of Rocks would be established as a means of controlling or monitoring use and related impacts. Permits could be required for recreational climbing, climbing in specific zones or areas, trail head parking, etc. Under this alternative, a permit system would be established to allow for certain limited or restricted climbing use of the Twin Sisters formation, as determined by the Superintendent.

Alternative C - Regulatory Alternative -- The emphasis would be on a regulatory approach to protect Reserve resources and to control climbing and other recreational uses. The focus, would be on climbing procedures. It would also seek to mitigate climbing-related impacts by restricting specific climbing activities equally throughout the Reserve. Areas identified in the CMP for management zoning applications that preclude or restrict climbing and other recreational uses would be protected by the enforcement of these regulations. Climbing on and in the immediate vicinity of any identified historic resources and within protected zones, including the California Trail Subzone, would be prohibited.

Alternative D - Proposed Action Alternative -- Integrates elements from alternatives B and C, with the principles of the Reserve's general management zoning as prescribed in the CIRO Comprehensive Management Plan. Climbing would be managed with the primary intent being to protect the resources and values of the Reserve, while providing for appropriate levels of public recreational climbing use. Climbing is prohibited within the California Trail management subzone, which incorporates the two spires of the Twin Sisters formation.

In addition to the four alternatives discussed in the Climbing Management Plan/EA, six other alternatives were considered but rejected.

The Reserve proposes to implement Alternative D. This action will have no adverse effect on the environment or cultural resources. There are no threatened or endangered species and no flood plains or wetlands in the area.

## Compliance

This action complies with the City of Rocks National Reserve Comprehensive Management Plan, the Endangered Species Act and Executive Orders on flood plains, wetlands, and environmental justice in minority and low income populations. No threatened or endangered species would suffer adverse effects. No flood plains or wetlands would be adversely affected. No natural or cultural resources would be put at risk. Minority and low income populations would not be adversely impacted.

Consultation required under Section 106 of the National Historic Preservation Act with the Idaho State Historic Preservation Officer, the Advisory Council on Historic Preservation, and interested members of the public has been completed. The SHPO and the ACHP have concurred with the Finding of No Adverse Effect for the proposed action.

This action is in accord with the Environmental Impact Statement approved for the City of Rocks Comprehensive Management Plan, approved February 5, 1996.

### **Public Review and Comment**

The Climbing Management Plan was developed with assistance of a broad cross-section of people. No one who wanted to participate was excluded or restricted. Planning meetings were held in the local community, as well as in Pocatello, Boise, and Ketchum, Idaho, to encourage wider participation. In addition, a climbing resource group was also convened to assist Reserve staff in the identification and resolution of climbing issues and concerns.

Post cards were sent out to everyone on the mailing list developed for the Climbing Management Plan/EA. Copies of the climbing plan were sent to those who returned the post cards, or who otherwise made the park aware that they wanted a copy. Copies were also provided for libraries throughout southern Idaho and northern Utah. The Draft Climbing Management Plan/EA was mailed on July 24, 1995, and the public review period ended on September 15, 1995.

The Reserve received and reviewed 220 comment letters. The vast majority of concerns about the climbing plan and EA concentrated on whether or not climbing should be allowed on the Twin Sisters. Views and opinions expressed varied widely regarding whether climbing use of the Twin Sisters was appropriate or not. The views and opinions of the climbing, local and historic preservation communities were all taken into consideration. Concerns were also expressed about the use and effect of manual drills on the rocks. Specific comments were:

- Allow no climbing on the Twin Sisters
- Allow unrestricted climbing on the Twin Sisters
- Climbing routes on the Twin Sisters are historic; climbing routes and use should continue
- Allow climbing on the Twin Sisters, but control it by use of climbing permits
- Allow climbing on even numbered days; no climbing on odd numbered days

- Prohibit climbing of the Twin Sisters during the historic use period (June-August), but allow climbing during the remainder of the year
- Close the entire trail corridor to climbing

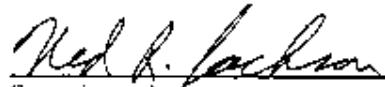
### Finding of No Significant Impact

Based on the analysis of potential environmental impacts contained in the Environmental Assessment and a review of the public comments, it is the determination of the National Park Service that the proposal is not a major federal action significantly affecting the quality of the human environment. The proposal is consistent with the Environmental Impact Statement approved for the City of Rocks Comprehensive Management Plan approved February 5, 1996. Therefore, an Environmental Impact Statement will not be prepared.

### Decision

It is my decision to implement the Climbing Management Plan as described in Alternative D of the Environmental Assessment with the following modification. The draft plan requires a permit when a power drill is used for bolting. Based on public comment, the Final Plan will be changed to require a permit for bolting, regardless of the type of drill used.

Recommended:

  
 Superintendent  
 City of Rocks National Reserve

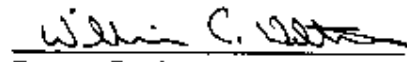
12/16/97  
 Date

Concurred:

  
 Director  
 Idaho Department of Parks & Recreation

12-21-97  
 Date

Approved:

  
 Deputy Regional Director  
 Pacific West Region

2/27/98  
 Date

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## INTRODUCTION

For decades, people have been drawn to the City of Rocks to experience a sense of freedom, inspiration, contemplation, and tranquillity by immersing themselves in a unique natural, scenic and historical setting. Cognizant of the need to protect these values for future generations, the City of Rocks National Reserve was established by Congress in 1988, "...in order to preserve and protect the significant historical and cultural resources and; to manage recreational use; to protect and maintain scenic quality...and to interpret the nationally significant values of the reserve."

Between 1990 and 1995, an important partnership effort between the National Park Service, the Idaho Department of Parks and Recreation, Cassia County and the landowners and other citizens of the area (collaborated) in form a long term vision of the future of City of Rocks National Reserve. During this period, planning for the future protection of the resources and values of City of Rocks has been the primary mission of the reserve's management team. These efforts came to fruition in February, 1996, with the signing of the Record of Decision for the Reserve's Comprehensive Management Plan. The completion of this plan provided Reserve management and staff with the overall framework document that was needed to guide the future protection of the resources within the City of Rocks, and an approved strategy for the implementation of the site development concepts, park operations, and programs and services which provide for the appropriate public use and enjoyment of Reserve resources.

In units of the National Park System, it is the General Management Plan for a park that sets the general framework for future actions and decisions. This usually followed by more detailed implementation plans such as the Resources Management Plan, Interpretive Plans and others. Now that the City of Rocks Comprehensive Management Plan has been completed, the Reserve staff has proceeded to develop several of these implementation or action plans. This Climbing Management Plan is one of those implementing plans.

In the spirit of legislation creating the City of Rocks National Reserve, the management of recreational rock climbing use, one of the most popular recreational uses at the Reserve, was determined by Reserve management to be an important public use activity, and having several specific resource and operational issues associated with its use, a specific climbing plan was determined necessary and appropriate for the Reserve. Those who have tracked the climbing issues on a national scale know that rock climbing is no longer an unnoticed use on public lands and has become an increasingly popular public recreational activity. Hence, a



climbing management plan for City of Rocks, as in several other national park areas, became an important and necessary component of the overall management of the Reserve related to the management of recreational use.

The Reserve's importance to rock climbing, as well as its diverse land ownership, jurisdictions, and myriad of other public and private uses, warranted a plan to guide Reserve management, in cooperation with all of the involved parties, through decisions on how best to conserve those resources which are intrinsically associated with rock climbing. The development of this climbing management plan for City of Rocks provides specific guidance to Reserve management on the appropriate level, type and location of climbing use within the Reserve. Its implementation will assist Reserve managers in meeting part of their legislatively mandated responsibility to manage recreational use within the Reserve.

It is therefore intended that this Climbing Management Plan will provide Reserve management and staff with specific guidance for the management of recreational climbing use within the Reserve and maintenance of a high quality recreational experience. The plan will also provide climbing users with the appropriate and necessary parameters within which climbing activities on the numerous rocks within the Reserve can be used and enjoyed.

This Climbing Management Plan is intended to be a specific action plan tiered off of the City of Rocks National Reserve Comprehensive Management Plan and Resources Management Plan.

It is acknowledged that the Climbing Management Plan is a dynamic document. Rock climbing use is changing at the City of Rocks, and the plan must also reflect changing conditions. From time to time, it may be necessary for Reserve managers to make minor changes or adjustments in the plan. Periodically, at least every 5 years, the plan should be carefully reviewed by an interdisciplinary team composed of both resource and recreation specialists, and revisions made to the plan where warranted.

Numerous terms specific to technical rock climbing are used throughout this plan. Please consult the glossary in Appendix E for definitions of unfamiliar terms.

## CITY OF ROCKS NATIONAL RESERVE

National Park Service

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## BACKGROUND FOR THE DEVELOPMENT OF THIS PLAN

This Climbing Management Plan implements the Proposed Action of the Draft Climbing Management Plan and Environmental Assessment which was produced in July, 1995. Following an extensive public review and comment period, discussions with the Access Fund, Oregon-California Trails Association, and other individual and organizational interests within the climbing and historic preservation community, and an extensive consultation period with the Idaho State Historic Preservation Officer and the Advisory Council for Historic Preservation, a Finding of No Significant Impact or FONSI was signed on the Climbing Management Plan on February 27, 1998.

The Draft Climbing Management Plan and Environmental Assessment is derived from an earlier version known as the "Interim Climbing Management Plan" (ICMP). The ICMP was developed in 1991, with the assistance of a 13-person public working group. Amongst this group were climbers, local landowners, natural resource specialists, representatives of the Idaho State Historical Society, environmental organizations, and local and national climbers' coalitions.

The ICMP was developed to provide an interim guide to climbing management within the Reserve prior to the completion of the Reserve's Comprehensive Management Plan and Environmental Impact Statement. However, attempts to proceed with the finalization of both the Comprehensive Management Plan and Climbing Management Plan reached an impasse over the management of public use on the historic Twin Sisters and the appropriateness of recreational climbing use on the pinnacles. Prior to the completion of either document, it was decided that a study was needed in order to obtain adequate information to determine the appropriate long-term management of Twin Sisters. Reserve management placed a moratorium on public climbing use of the Twin Sisters formation until the study results were available. The Twin Sisters Resource Study was completed in December, 1993. The study findings determined that while mitigation measures could be considered to reduce the impacts of recreational climbing use on the scenic, natural, and auditory environment on and around the Twin Sisters, that all public use, including any recreational climbing use of the pinnacles, was an inappropriate activity related to the protection of cultural resources. That is was most appropriate to manage the Twin Sisters as part of the California Trail Management Zone, in which cultural resources protection is given the highest priority and is the paramount value to be protected within the subzone. Therefore permanent closure of these pinnacles to recreational climbing use was necessary to protect the historic and cultural resource aspects of the Twin Sisters. The Final Comprehensive Management Plan and Environmental Impact Statement (EIS) reflected this recommendation. However, the Record of Decision for the EIS deferred the decision concerning the Twin Sisters until the completion of the Climbing Management

Plan.

Though the time taken to assess impacts through the Twin Sisters Resource Study delayed the completion of the climbing management plan beyond the interim period, some of the management tasks identified in the ICMP were carried out and major elements of the earlier plan were incorporated into both the draft and final Climbing Management Plan.

With the Twin Sisters Resource Study completed, a Draft Climbing Management Plan and Environmental Assessment was produced in July, 1995. In addition to the proposed action, three other alternatives and their related impacts for climbing management were examined in the Environmental Assessment; a No Action Alternative (Alternative A), a Permit System Alternative (Alternative B), and a Regulatory Alternative (Alternative C). The proposed action in the draft document (Alternative D) generally reflects a combination of a regulatory and permit system approach.

Public comment and review of the Draft Climbing Management Plan and Environmental Assessment was received until Friday, September 15, 1995. Some 250 persons commented on the draft plan. A total of 230 written comments were received. Comments received generally favored most aspects of the draft climbing management plan, but differed primarily on the issue of whether or not recreational climbing use of the Twin Sisters was appropriate. Sentiment was divided on this issue; some members of the public feeling that a regulated climbing use of the Twin Sisters could be done in a manner so as to not harm the historical integrity of the site, others feeling that climbing use of the Twin Sisters was an inappropriate activity on the twin spires, regardless of how it may be regulated, given the historical significance of the feature.

The proposed action contained within the Draft Climbing Management Plan and Environmental Assessment was intentionally consistent with the recommendations made in the City of Rocks Comprehensive Management Plan, and the approach taken was supported by the Idaho State Historic Preservation Officer and the Advisory Council on Historic Preservation.

This Final Climbing Management Plan incorporates the decision made in the decision notice incorporated in a Finding of No Significant Impact (FONSI) on the Draft Climbing Management Plan and Environmental Assessment. The decision was to implement the Climbing Management Plan as described in Alternative D of the Environmental Assessment with one minor change to require a permit for rock boltings, regardless of the type of drill used. The decision also provides for permanent closure of the Twin Sisters pinnacles to climbing and other recreational use. This finding was supported by the findings of the Twin Sisters Resource Study, and in consultation with the Idaho State Historic

Preservation Office and the Advisory Council on Historic Preservation. This recommendation to continue to close Twin Sisters to all recreational use is also parallel with the recommendation of the proposed action of the Comprehensive Management Plan. While the Record of Decision on the Comprehensive Management Plan deferred the decision regarding the Twin Sisters until the completion of the Climbing Management Plan, the signing of the FONSI on the Draft Climbing Management Plan and Environmental Assessment, dated February 27, 1998, resolves this remaining issue with this decision.

The Final Climbing Management Plan, with a few minor improvements and changes, retains the same prescriptions for climbing use management contained in the draft plan and environmental assessment. These few minor modifications were done in response to public comment, input from Cassia County representatives, and updated resource data from Reserve staff related to recent land acquisitions and other actions within the Reserve.

Changes of note between the Draft and Final Climbing Management Plan include a provision for a required permit for all rock bolting, regardless of whether a manual or power drill is used. Cassia County will also be encouraged to modify their existing county ordinance related to the use of drills on rocks within the Reserve so that there is consistent application and enforcement of this provision regardless of whether climbing rocks are located on public or private lands. The second primary change between the draft and final plan is the availability of several more rock features to recreational climbing use. Now available for public use are both east and west face of Chinaman's Head, the Prospector, Your Own Private Idaho, and Nematode. It was determined that none of Chinaman's Head is located within the restricted Research Natural Area, and the other three rock features are now within public ownership as a result of recent land acquisitions by the National Park Service, and are now available for public use.

However, it should be reiterated that access to rock formations on private land within the Reserve remain closed to public use unless specifically authorized by the landowner.

## PURPOSE AND NEED

Rock climbing is currently one of the most popular recreational activities at City of Rocks National Reserve. Beginning (in 1986) about a decade ago, the area experienced a rapid growth in popularity and climbing route development. As a result of this surge of new route activity, City of Rocks gained renown for sport climbing, while still offering classic, though less celebrated, crack climbs and traditional face climbs. With the establishment of the City of Rocks National Reserve in 1988, Reserve management recognized the need to develop an operational plan to ensure the protection of the Reserve's cultural and natural resources while allowing for the continued enjoyment of rock climbing. This Climbing Management Plan also helps to implement a Congressional provision of Reserve legislation to "... manage recreational use ...".

The purpose of the Climbing Management Plan is to provide Reserve managers with a determination of:

- 1) what is the appropriate level and type of climbing use within the Reserve;
- (2) what climbing practices are used and are necessary and appropriate at City of Rocks, and what their associated impacts are;
- (3) what, if any, types and levels of impacts associated with climbing in different areas of the Reserve are unacceptable and impair park resources or result in a derogation of park values;
- (4) conversely practices which are inappropriate and not to be used at the reserve; and
- (5) based on these factors, along with other management considerations, what levels and kinds of mitigating management actions are necessary to assure the long-term protection of park resources and values, and retention of the overall visitor experience.

The need for the Climbing Management Plan is based upon a July 19, 1991 memorandum instructing each unit of the National Park System having climbing activities within a park area to develop a Climbing Management Plan.

## AUTHORITIES, POLICIES & GUIDELINES

City of Rocks is a unit of the National Park System. When Congress established City of Rocks as a National Reserve, it directed the Secretary of the Interior to manage the Reserve in cooperation with state and local governments. Congress also specified that management and administration of the Reserve should ultimately be transferred to the state or an appropriate local governing body. Transfer of the day-to-day management of

the Reserve to the State of Idaho occurred in May, 1996. Today, the Idaho Department of Parks and Recreation manages City of Rocks National Reserve. The National Reserve remains a unit of the National Park System and under NPS responsibility and general oversight. A cooperative agreement between the Idaho Department of Parks and Recreation and the National Park Service details opportunities for coordination, technical assistance and defined roles and responsibilities of each entity.

Public Law 100-969, which created City of Rocks National Reserve, specifies that the area is to be administered subject to the provisions of the 1916 Organic Act, which established the National Park Service. The Organic Act specifies that units of the National Park system are to:

- \* *conserve the scenery and the natural and historic objects and the wildlife therein [and] to provide for the enjoyment of the same in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations.*

Public Law 100-969, Section 202(a), further states that City of Rocks is established as a National Reserve in order to:

- \* *preserve and protect the significant historic and cultural resources*
- \* *manage recreational use*
- \* *protect and maintain scenic quality*
- \* *interpret the nationally significant values of the Reserve.*

Guidance is found in the 1988 National Park Service Policies which recognizes mountaineering and rock climbing as generally allowable activities on park land. While conservation of resources is of primary importance, the National Park Service encourages recreational activities that do not result in:

- \* *inconsistency with the enabling legislation or proclamation, or derogation of the values or purposes for which the [Reserve] was established*
- \* *unacceptable impacts on visitor enjoyment due to interference or conflict with other visitor use activities*
- \* *consumptive use of resources*
- \* *unacceptable impacts on resources [natural and cultural] or natural processes*
- \* *unacceptable levels of danger to the welfare or safety*

of the public, including participants

Determinations of when and where on federal land climbing may be allowed are subject to provisions of Title 36 of the Code of Federal Regulations 1-5 & 7, which includes the Superintendent's discretionary authority to regulate use (36CFR 1.5). Because of the different land ownerships within the boundaries of City of Rocks National Reserve, rock climbing, like other visitor use activities, is, in some cases, subject to the provisions of Idaho state law, Idaho Parks and Recreation Rules, Cassia County ordinances or the prerogatives and permission of private landowners.

In a memorandum from the Washington Office of the National Park Service (July 19, 1991), each park area with climbing activities was instructed to develop a Climbing Management Plan. The Pacific Northwest Regional Office of the National Park Service subsequently required that Climbing Management Plans be drafted in several park areas within the region, including City of Rocks National Reserve. More recently, the National Park Service has suggested the promulgation of servicewide climbing-specific regulations. Eventually new federal regulations or directives pertaining to climbing management in national park areas may be applied at City of Rocks National Reserve.

The City of Rocks Comprehensive Management Plan (1995) provides the direction under which the National Reserve is to be managed.

It also defines the parameters within which the Climbing Management Plan must ensure the protection of the Reserve's natural and cultural resources while providing for the continued enjoyment of the resources by the public, including appropriate rock climbing practices and other forms of public recreational use.

City of Rocks National Reserve encompasses several special area designations which preceded the establishment of the Reserve and provide emphasis for the Reserve's management responsibilities for the protection of significant resources and values. In 1964, most of City of Rocks was designated as a National Historic Landmark because of its relationship to the California Trail and the history of American westward migrations. In 1992, the California National Historic Trail was designated as a component of the National Trails System for the purpose of identifying and protecting the historic route and its historic remnants and artifacts for public use and enjoyment.

In 1974, City of Rocks became a National Natural Landmark because of its geomorphology. There are land forms here that are comprised of some of the oldest rocks in North America. In 1983, a Research Natural Area was established within the present Reserve boundary for the principal purposes of preserving the special area for geological and biological research.



Other legislation pertinent to the management of City of Rocks National Reserve includes the American Antiquities Act of 1906, the National Historic Preservation Act of 1966, the National Environmental Policy Act of 1969 (NEPA), and the Archeological Resources Protection Act of 1979.

#### GOALS AND OBJECTIVES OF THE CLIMBING MANAGEMENT PLAN

Climbing is, and will continue to be, an important recreational activity at City of Rocks. The overriding goal of the Climbing Management Plan is to provide a management framework which complements the City of Rocks Comprehensive Management Plan and Resources Management Plan, and which provides for the continued enjoyment of rock climbing in the National Reserve within a managed recreational environment. The plan is intended to provide guidance concerning which rock climbing activities and sites are appropriate for public climbing use within the Reserve, and will still be within the overarching purpose of the Reserve which is to protect the natural, historic and scenic resources of the area for this and future generations. This is supported through the following goals and objectives:

- I. Provide for the protection and preservation of historic properties and ensure that the Reserve's significance as a National Historic Landmark is not adversely affected by climbing activities.
  - 1) Develop the guidelines necessary to ensure that historic inscriptions and other cultural resources are not physically damaged as a result of climbing activities.
  - 2) Develop the guidelines necessary to protect the overall integrity of significant cultural resources, which include, but are not limited to, the experiential aspects of the historic setting, the association between the historic event and the historic property, and the feelings which these aspects evoke.
  - 3) Ensure that climbing educational or interpretive programs address the protection of cultural resources and values in the Reserve, and adequately communicate to both English and non-English-speaking visitors.
- II. Manage climbing so that impacts on natural resources (soils, vegetation, rock, wildlife, air, water quality, scenery, etc.) are minimized.
  - 1) Develop guidelines necessary to ensure that natural resources are not degraded significantly. The level of impacts allowed should be determined by some management process (such as "Limits of Acceptable Change") designed to conserve vital ecosystem processes and linkages.

- 2) Ensure that climbing educational or interpretive programs address natural resource protection in the Reserve, and adequately communicate to both English and non-English-speaking visitors
- III. Preserve the diversity of climbing experiences which currently exist at City of Rocks within the provisions that are enumerated by this plan and the Comprehensive Management Plan.
- 1) Develop guidelines which will allow routes with either fixed or removable protection and anchors to exist.
  - 2) Develop guidelines which will allow opportunities for climbing experiences ranging from more social settings to solitude.
- IV. Prevent the proliferation of fixed anchors which results in unacceptable impacts on Reserve resources.
- 1) Establish and implement a policy regarding bolting and other fixed protection for climbs at City of Rocks (consider such things as equipment used, installation, maintenance, existing or potential cumulative impacts)
  - 2) Establish a policy and implementation process regarding new route development in the Reserve (consider such things as locations, density, diversity of route style and climbing experiences, as well as existing or potential cumulative impacts).
- V. Encourage continued public involvement and collaboration with the climbing community and historic preservation community to assist City of Rocks management with climbing-related issues.
- 1) Provide for consultation between reserve managers, climbers, climber groups and organizations, private landowners, the environmental community, the historic preservation community and others.
  - 2) Reduce, resolve, and prevent conflicts between reserve users, management, and private landowners by establishing a process for ongoing communication between these parties.
  - 3) Develop partnerships to implement projects to mitigate impacts related to climbing use activities.
- VI. Manage the regulation of climbing activities to the extent necessary to protect resources.
- 1) Develop an educational program which promotes minimum

impact practices among climbers. Provide communication and education to non-English-speaking visitors.

2) Provide opportunities for involvement of climbers in cooperative projects with City of Rocks to mitigate natural and cultural resource impacts.

VII. Allow opportunities for commercial guiding within the Reserve.

1) Establish equitable guidelines for commercial guiding activities.

2) Establish guidelines to ensure that commercial guiding will be in compliance with appropriate laws and regulations and the protection of resources and values for which the Reserve was established.

### HISTORICAL PERSPECTIVE

There is evidence that native people have inhabited this area, south central Idaho, for more than 10,000 years. The Northern Shoshone, who inhabited City of Rocks when American emigrants arrived, had used the area for more than 400 years. The "City's" first documented non-Indian visitors were Hudson's Bay Company trappers in 1826. In 1842, Joseph R. Chiles located the section of the California Trail which passes through City of Rocks and travel along this corridor began one year later. This trail was used by most of the pioneers bound for California and nearly all of the 49ers who traveled overland to the California gold fields.

It was one of these emigrants who named the area "City of Rocks," which gained fame as an attraction along the trail. The use peaked in 1852 when some 52,000 travelers passed over the California Trail. The overgrazing of lands along the trail and the depletion of game by the emigrants eventually led to conflicts with the Native Americans, who by the late 1860s were forced to resettle on to reservations.

Following the decline of California-bound emigration, the route established by the Salt Lake Cutoff evolved to serve the Boise-to-Kelton stage and freight traffic until the early 20th century.

In the mid-1870s, the area began to be settled. Cattle ranching began in 1875 and dry-land farming started before 1900. After 1916 increased aridity and economic conditions ended farming, and farms were consolidated into ranches. Lands that were not settled remained in federal or state ownership.

In 1964, the "City" was designated a National Historic Landmark. The designation recognized that the area contains some of the best preserved segments of transcontinental wagon routes in the

country, numerous rock formations bearing pioneer inscriptions or serving as navigational landmarks, and a few surviving structures built by the early settlers. In 1974, the area was also designated a National Natural Landmark in recognition of the area's unique geology, which includes some of the oldest rocks in North America. In 1988, Congress decided to protect these historical and geological features by creating the City of Rocks National Reserve.

### **DESCRIPTION OF THE RESERVE**

City of Rocks National Reserve is approximately 14,300 acres in size, and includes over 9500 acres of public land. The Reserve rises from about 5650 feet in low, shrubby basins where Circle Creek meets the eastern Reserve boundary, to 8867 feet at the summit of Graham Peak in the north. Total relief is 3217 feet.

### **CLIMATE**

City of Rocks National Reserve has a semi-arid climate characterized by low to moderate precipitation, great extremes in both daily and seasonal temperatures, and low relative humidity.

### **PHYSIOGRAPHY**

The Reserve is in the southern part of the Albion Mountains. Much of City of Rocks is in the headwaters of east-flowing, intermittent tributaries to the Raft River.

### **GEOLOGY**

The Albion Mountains are part of one of approximately two dozen Cenozoic metamorphic core complexes of the North American Cordillera.

The landscape of City of Rocks has been sculpted from the upper parts of the Almo pluton, one of four intruded segments of the Cassia batholith in the Albion Range. The pluton is composed of granitic-type rocks, quartz monzonite and granodiorite, which commonly occur together and are collectively referred to as adamellite.

The Green Creek complex is the basement rock of the Albion Range and is predominantly granitic gneiss. The Green Creek complex has been dated at about 2.5 billion years, which would make this one of the oldest known rock in the western United States. The contact between the pluton and gneiss is observable on the south side of the ridge separating City of Rocks from Castle Rocks, on the west side of Smokey Mountain, and along the west side of the row of pinnacles from Pinnacle Pass northward through the saddle between the Twin Sisters. The Green Creek complex is absent from the western part of the Reserve where the Almo pluton has

intruded through it and into the Elba Quartzite.

The Green Creek complex is unconformably overlain by the Elba Quartzite. The quartzite is more resistant to chemical weathering than the adamellite and forms the capping layer on most of the ridges surrounding the City of Rocks. Volcanic deposits of quartz latite and rhyolite cap part of the ridge along the western boundary south of Emery Canyon.

The most notable landscape feature of the Reserve is the abundance of prominent, steep-sided, small-scale, granitic-gneiss domes that form by granular disintegration along joints. Most have formed in the Almo pluton, but some also occur in the gneiss of the Green Creek complex. Many rocks were further shaped by weathering and case-hardening. The adamellite has eroded into a fascinating assortment of shapes, one as high as 500 feet.

No evidence of glaciation is noted within the Reserve, but has been found in higher portions of the range farther to the north.

#### **SOILS AND SOIL EROSION**

The majority of mountainside soils (slopes greater than 20 percent) are shallow (less than 20 inches to bedrock) and composed of very gravelly or cobbly loam or coarse sandy loam with large rock fragments exposed at the surface. The basin soils are moderately to very deep (greater than 60 inches to bedrock) and composed of loam or sandy or gravelly loam.

The majority of soils in the Reserve are highly erodible. Wind erosion potential is moderate for some soils in the Reserve. Water erosion hazard is severe for most mountainside soils. Soil erosion is greatest near roads and trails on steep slopes where runoff collects, and near intermittent stream channels.

#### **WATER RESOURCES**

Surface water is limited to a few small headwater streams and springs and is generally (collected and) used for agricultural purposes. Little is known about the status of ground water in the Reserve.

Because most of the soils in the Reserve are highly erodible, several severely eroded areas contribute sediment to streams during high flows corresponding to storms and spring snowmelt. High stream sediment and associated turbidity can negatively affect stream organisms both in and outside the Reserve far downstream from the source of particulate matter.

Cattle, which concentrated in riparian areas, accelerate soil erosion and contribute fecal coliform to streams and springs in the Reserve.

## **WETLANDS AND FLOODPLAINS**

The creeks and drainages of the Reserve are subject to flooding during summer months when thunderstorms can produce large quantities of precipitation in a localized area. The hazards from these summer floods are considered minimal though the environmental consequences can be significant.

Many small wetlands exist in the Reserve, typically in riparian areas next to streams and springs. Because of the aridity of the region, these wetlands, although quite small, are important resources for many forms of life. They are also important in moderating high water flows, and consequent erosion, in extending the duration of water flow in potentially ephemeral streams.

## **VEGETATION**

Today most of the plant cover, except vegetation on steep, rocky exposures, is considerably changed from its natural condition. The changes over time were caused by a combination of human-induced factors, including intense grazing, dryland farming, fire suppression, brush control, seeding, development of roads and trails, and camping.

The dominant plant communities in the Reserve include pinyon/juniper woodlands and forest, conifer/aspen woodlands and forest, riparian scrub and herbaceous wetlands, big sagebrush and grasslands, mixed scrub, and mountain mahogany scrub, high elevation meadows, and other unvegetated areas. The Reserve contains the northernmost range of the single-leaf pinyon pine. This degree of biological diversity in a relatively small area is attributable to differences in elevation, slope, aspect, soil type, and available water, and provides habitat and forage for a variety of wildlife. Vegetative cover is crucial to protecting slopes from soil erosion and gully formation in this crissic granite terrain.

Preliminary field surveys have discovered the presence of three rare and sensitive plants. They are Simpson's hedgehog cactus, narrow-leaved Indian paintbrush, and Kruckeberg's swordfern. There are no known federally listed or candidate plant species within the National Reserve boundaries.

## **AIR QUALITY**

City of Rocks has been designated a class II area for purposes of controlling increases in air pollution under the Clean Air Act. Due to the low population density and lack of large emission sources near the Reserve, air quality is generally very good. Air quality data for the Reserve has not been systematically collected. However, air quality monitoring in the region shows a trend in deterioration which is probably reflective of City of Rocks as well. Notable air quality related values at City of

Rocks are visibility, scenery, and the night sky.

#### **WILDLIFE (and Threatened and Endangered Species)**

The diverse habitat of the Reserve supports a large variety of mammals, birds, reptiles, and invertebrates. Streams in the Reserve provide only marginal fish habitat and are not known to support any fish. The effect that recent droughts, apparent loss of wetlands, and land uses in the area may have had on the occurrence of fish has not been evaluated.

A partial list of mammals in the reserve includes. mountain lion, mule deer, coyote, bobcat, badger, porcupine, red fox, cliff chipmunk, mountain cottontail and pygmy rabbits, blacktail jackrabbit, northern grasshopper mouse, Merriam shrew, several species of voles, and a variety of rats.

According to the U.S. Fish and Wildlife Service, there are no federally listed threatened or endangered species in the City of Rocks area. Two candidate species of hawk have been identified, however the Ferruginous and Swainson's hawks. A third candidate Townsend's big-eared bat, may also occur in the Reserve. There are species recognized by Bureau of Land Management and Idaho Department of Fish and Game as "sensitive" and "species of special concern"; these include the bobcat and kit fox.

#### **SCENIC QUALITY**

Scenic quality is considered excellent where views contain high degrees of unity, vividness and visual intactness (naturalness). Seven viewpoints in the Reserve were identified as having these outstanding qualities. Maps and descriptions of outstanding viewpoint appear in the City of Rocks Comprehensive Management Plan.

The variety of textures, colors and shapes displayed on the natural landscape also contribute considerably to the Reserve's scenic quality.

#### **NATURAL QUIET**

The natural quiet of the remote reaches of the Reserve is valued by visitors as a quality to be experienced and as a condition that enhances opportunities to hear natural sounds and to view wildlife. It is also reflected in the area's historical full name: The Silent City of Rocks.

#### **SPECIAL AREA DESIGNATIONS**

City of Rocks is a unique natural area which gained designation as a National Natural Landmark. It is nationally significant because it contains the best examples of bornhardt rock formations in the region, and probably the country, and possesses

considerable natural scenic beauty.

The designated Research Natural Area is a 312-acre area located among rock outcrops north of the Circle Creek basin. The unique and special characteristics of the site are the outstanding examples of bornhardt rocks formed by exfoliation processes and the high degree of habitat and floristic diversity. The area contains the northern limit of the pinyon-juniper vegetation type and an example of a sagebrush steppe vegetation type in a rare natural condition.

City of Rocks was designated by the Secretary of the Interior as a National Historic Landmark because of its relationship to the California Trail and the history of American westward overland emigration during the 1840s and 1850s. Designation as a National Historic Landmark requires that the historic property meet the criteria for listing on the National Register of Historic Places. A property must be nationally significant and retain exceptional integrity as defined by historic qualities of location, design, setting, materials, workmanship, feeling, and association.

City of Rocks became a major landmark and principal stopping place along the California Trail and the Salt Lake Alternate route. Many emigrants traveling through City of Rocks recorded their impressions of the intriguing granite outcrops. In keeping with the National Historic Landmark designation, City of Rocks has retained its association, or direct link, between the physical features and the important historic events of the mid-1800s. City of Rocks provides opportunities to experience a segment of the California Trail in a setting that also retains the aesthetic and historic feeling of the original migration era.

#### **HISTORIC PROPERTIES**

City of Rocks includes approximately nine miles of California National Historic Trail and Salt Lake Alternate route corridors comprising some of the best preserved remnants of overland emigrant routes in the nation. Within the National Historic Landmark boundaries, and specifically mentioned in the Landmark designation, are: 13 register rocks bearing emigrants' inscriptions; six small segments of the California Trail identified as maintaining their original rut or defile contours; the prominent spires of the Twin Sisters formation; and Circle Creek basin, the principal emigrant encampment site at City of Rocks. A large portion of the cultural resources within the boundaries of the Reserve are currently on private property.

The Twin Sisters, also historically referred to as "Spire Rocks," "Steeple Rocks" or Twin Mounds" (among other names), became a navigational point of reference within City of Rocks. The formation was specifically mentioned in some of the travelers' diaries because of its location at the junction of the emigrant trails and its prominence within the City of Rocks skyline.



The views seen from the emigrant trails are a critical component of the Reserve's integrity. They provide a sense of the emigrant experience and were important historically in aiding the emigrants' passage through City of Rock and Granite Pass. Thus, the "viewshed," or the extent of the views seen from the two emigrant trails, is a significant feature of the National Historic Landmark.

There are many other historic properties and resources which not only serve as examples of significant themes in the historic continuum of the National Reserve, but also contribute to the ambience of the Reserve's historic rural setting. The scenic quality of the American West is therefore considered a significant cultural resource to be preserved within City of Rocks National Reserve.

Archeological surveys and testing carried out over the past four years have revealed more than forty prehistoric sites associated with a variety of subsistence and hunting activities within the Reserve's boundaries.

The importance of City of Rocks to Native American groups, beyond known food gathering activities, can be neither supported nor dismissed at this time. Research is continuing with an ethnographic overview funded by the National Park Service, which began in 1995. The study may provide information on whether Native American groups attribute spiritual values to City of Rocks and its prominent features.

### VISITOR USE LEVELS

The statistics for City of Rocks National Reserve show that visitation has grown from approximately 39,000 visitors in 1988, to 98,000 in 1992, and approximately 105,000 in 1994. Most use of the Reserve occurs from May through October, with June typically being the busiest month.

Based on a study conducted by the Bureau of Land Management in 1987 and a visitor use survey conducted by the Cooperative Park Studies Unit at the University of Idaho in 1991, the heaviest overall visitation occurs during weekends. Pleasure driving and sightseeing are the most popular visitor activities followed by climbing. The largest group of visitors during the week are usually climbers. Sightseeing and pleasure driving are the most popular activities on weekends, with climbing use being the second most popular weekend activity.

In addition to rock climbing, City of Rocks hosts a number of other uses. These include sightseeing, camping, hiking, picnicking, photography, outdoor education, horseback riding, mountain biking, cross-country skiing, snowmobiling, and hunting.

### CLIMBING HISTORY

The history of climbing at City of Rocks is best understood in the context of national and international trends in the development of climbing purposes and methods. Documented climbing in America stems from the early 1800s. The earliest climbs were typically associated with the exploration of the West, primarily for mapping and scientific purposes. Pioneers using the California Trail were probably the City's first non-Indian climbers.

Climbing for recreational purposes was established in the United States 1905 in the form of mountaineering: the ascent of summits. By the early 1930's, the sport diverged to create a sub-sport, rock climbing - the ascent of rock faces. After World War II, pitons were the primary means of protection, and routes were mostly limited to cracks. Hand-placed expansion bolts were also used during the post-war years, mostly to protect blank sections between discontinuous cracks.

By 1960, there were an estimated 2000 "active climbers" (experienced climbers who climbed regularly) in the United States and climbing had evolved a clear, but informal, set of stylistic and ethical "rules" which were widely accepted. The rules dictated that an ascent of a "line" - the particular crack or zones of weakness in the rock - be started from the ground. During first ascents, routes were "cleaned," meaning that loose rock, dirt, and vegetation were removed for safety reasons. The questionable security of pitons and other hardware placed for climbers' protection meant that falls should be avoided. It was

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widely thought that any weighting of the rope invalidated the ascent. Bolts, though occasionally used, were labor intensive to install and thought to detract from the "adventure" of the climb.

During the early 1960s, the first recorded roped climbing occurred at the City of Rocks, primarily by a small group of climbers from northern Utah. A climbing club, known as "The Steinfelds," and members of the Lowe family and their friends, began to visit the "City" regularly. The routes these climbers established typically followed cracks and were protected by pitons and occasionally bolts. Although there were few climbers visiting the City during this time, the Utah group was very active, establishing at least 200 routes.

By 1970, there were about 5000 active climbers in the United States. By 1985, this number had increased to about 50,000. Over this period rock climbing areas were established in nearly every state, and climbing-related businesses evolved into a \$20 million per year industry.

In the early 1970s, artificial chockstones were introduced, which quickly replaced pitons as the standard form of protection. Pitons were more difficult to use and caused much greater damage to the rock.

In reference to the rating system commonly used in the United States (5.0 being the easiest), typical active climbers in 1970 were climbing at a standard of technical difficulty of 5.7-5.8 (Yosemite decimal system). By 1985 they were climbing 5.9-5.10. The highest rating in existence jumped from 5.11 in the early 1970's to 5.13 in the mid-1980s.

Between 1970 and 1985 there was also a slow shift in style and ethics, further contributing to the advancement in climbing difficulty. Falling became more acceptable in the 1970s, although a no-fall ascent was still considered superior. Bolts also became more accepted during this period as climbers increasingly looked to crackless rock faces for first ascents. This occurred, in part, because most cracks in popular climbing areas had been climbed by the early 1980s.

During the 1970-1985 period, climbing at City of Rocks mirrored the changes seen in climbing nationally. The number of climbers visiting the "City" grew at a corresponding pace. Initially, climbers from the local region dominated the climbing activity but by the mid-1980's, visitors from outside the region started to outnumber local climbers. Up to 20 new routes were established each year between 1975 and 1985, and as in the rest of the country, the use of bolts began to gain popularity. In 1985, a climbing guide to the area was published, describing nearly 300 routes, and several articles appeared in national climbing magazines.

During the 1970s, European rock climbers began to develop different types of equipment, techniques, and "rules" in an effort to climb more physically difficult routes. By the mid-1980s, this had evolved into a sub-sport marked by three differences from the traditional American methods. First was the acceptance of rappel-placed bolts prior to the first ascent. Second was the use of battery-driven power drills to place bolts, which was unheard of in the U.S. Third was the acceptance of a new "rule" that allowed a climber to practice individual moves with tension from the rope prior to the free climbing attempt.

These developments eliminated the risk associated with placing protection on lead and increased the efficiency of practicing moves to overcome difficult sections of the route. Consequently, by the mid-to late 1980s, Europe was known for the best climbers and the hardest routes in the world.

Stimulated by competition, some Americans began to practice the European methods (which became known as "sport climbing") by the mid-1980s. Many American climbers preferred the traditional methods (commonly referred to as "traditional climbing"). In several climbing areas across the country, some traditional climbers reacted violently to routes established on rappel by removing or destroying the rappel-placed bolts. Over the last few years, these types of confrontations have subsided, and sport climbing has become more accepted in America. Many climbers participate in both sport and traditional climbing, but there are climbers who identify exclusively with one or the other. Consequently, there is still controversy.

A fourth practice developed in the mid-80s which has caused considerable controversy in the climbing community. This is the practice of deliberately altering the rock to facilitate new climbs. Occasionally, climbers attempt to justify varying degrees of rock modification to allow for continued new route exploration, particularly on routes with a high level of difficulty. These alterations range from smoothing or filing sharp rock edges to "manufacturing" complete holds with power drills and chisels. Alterations commonly involve enlarging existing holds, using epoxy to reinforce loose holds, or creating new holds to connect existing features. Rock alteration is condemned by most traditional and sport climbers and is illegal in all National Park areas. Consequently, it occurs sporadically and usually secretly. A small but growing number of climbers practice rock alteration, and some have begun to advocate it openly.

With the advent of sport climbing in the U.S. the number of climbers and new routes soared, due, to a large extent, to the increased safety and convenience associated with sport climbing. Since 1990, hundreds of indoor climbing gyms have been constructed near urban areas, increasing the number of climbers and the popularity of professional climbing competitions.

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Indoors, dedicated athletes train for difficult rock routes on artificial holds, while other people sample a facsimile of rock climbing for the first time. While there were an estimated 40-50,000 active climbers in 1985, there are now an estimated 300-400,000 active climbers nationwide. This increased number of climbers support four climbing magazines with a combined circulation of approximately 100,000 and an industry grossing well over \$30 million/year.

Events at City of Rocks since 1985 largely reflect these national and international trends. In 1986, climbers began rappel-placing bolts using power drills to establish sport routes. Power drills were also used to replace old, smaller bolts that had been placed on lead. On many new and old routes, chain anchors were installed on top to accommodate high levels of use. Over 300 new routes were established in 1988 and 1989, mostly protected by rappel-placed bolts. By 1991, it was estimated that approximately 3000 bolts were in place at City of Rocks (including rappel anchors). A Cassia County ordinance restricted the use of power drills at the City of Rocks in 1991. As a result, the number of new routes and new permanent anchors diminished sharply. As the "City" received increased media attention for its sport routes and quality of climbing and camping experience, the area's popularity increased substantially. The City of Rocks is visited by climbers from throughout the world.

#### THE CURRENT CLIMBING SITUATION AT CITY OF ROCKS NATIONAL RESERVE

Recreational climbing use of the City of Rocks is one of the more popular recreational activities. Currently, those who climb at City of Rocks range from local individuals and families (from southern Idaho/northern Utah) to foreign climbers touring the United States. Presently, there are four professional rock climbing schools who have Special Use Permits to instruct and guide in the Reserve. Permittees are required by State law to be licensed by the Idaho Outfitters and Guides Association; these licenses include insurance requirements, CPR-certified staff, and other stipulations. In addition, local schools, youth and safety groups use City of Rocks as a training ground. There is also a significant amount of scrambling on the more accessible rocks by non-technical climbers. Climbing at City of Rocks is attracting a larger number of people with varying levels of skill and experience than ever before.

Today, more than 600 established technical routes exist in the Reserve. Most climbing is concentrated on popular crags near roads. The majority of technical climbing routes are rated 5.7 to 5.11. While many routes are climbed with protection primarily by removable hardware, the principal style of climbing is on bolt-protected faces. There is little climbing activity in less accessible areas of the Reserve, though some exploration continues.

Although there has been concern over climbing ethics at City of Rocks, there have been very few actual conflicts between climbers. Practices such as "retro-bolting", route "chopping" and chipping of holds have been generally unacceptable to the local climbing community. Most of the bolts on climbing routes were placed on rappel, using power drills, to create technically difficult routes and to increase safety. Most of the routes were established before the county ordinance prohibiting the use of power drills. Gymnastic chalk is widely used.

City of Rocks has been recognized as having some of the nation's most difficult climbing routes. In 1990 and 1991, new route development decreased dramatically, due largely to the restriction on power drilling. All climbing-related activity at City of Rocks seems to have reached a plateau in the last few years. This change may be due, in part, to the discovery of new climbing areas located in Southern Idaho and Northern Utah. The shift may also be a reaction to increased regulation, limits and fees on camping, or a more crowded environment than climbers experienced in the past. Some local climbers now choose to visit City of Rocks just for the day, instead of competing for the campsites now available within the Reserve. Though the perceived crowding is only a fraction of that experienced at many climbing areas, many climbers feel that it affects the solitary nature of the City of Rocks experience.

There are significant concerns among property owners and local residents over unauthorized public use of private property and increased visitor presence at the Reserve. Less than one third of the approximately 14,300 acres within the Reserve boundary is in private ownership and not accessible to public access. There are several significant climbing rocks located on these private parcels.

The most obvious factor affecting climbing at the "City" is the increased visitor use due to knowledge of City of Rocks outside of the local area. Some of the consequences of this publicity are competition for campsites and increased erosion on trails from foot traffic, and camp site areas and access from motor vehicles.

Regulations which restrict rock bolting, power-drilling and rock alteration are in effect at City of Rocks. Seasonal closures are annually imposed on some crags in the Reserve to protect nesting raptors.

More than 100 campsites and a network of social roads to access them existed prior to establishment of the Reserve. None of these roads or campsites were site-selected or designed for layout or minimal impact to resources. Since establishment of the Reserve approximately 25% of the campsites have been closed, due to excessive erosion, for natural rehabilitation. Other

sites have been temporarily stabilized as best as possible while awaiting funding for a professional landscape architect to evaluate each site for appropriate design elements and reconfiguration and consolidation of access roads. Many eroded trails to popular formations have also been stabilized or reconstructed.

As expressed during the Comprehensive Management Planning process, members of the historic preservation community, other members of the public, and agency officials from the State of Idaho Department of Parks and Recreation, the Idaho State Historic Preservation Officer, and the National Park Service consider climbing to be an inappropriate activity to ensure the long-term protection of particular natural formations which have historical significance associated with the California Trail; and have called for a climbing prohibition on some of the rock features, including all inscription rocks and the Twin Sisters pinnacles, an important landmark to California Trail emigrants.

For these reasons, it was recommended that climbing be prohibited within the California Trail Subzone, which was established to protect resources related to the California Trail. The Twin Sisters is located within the California Trail Subzone.

Positive, proactive measures have been taken by climbers to protect and restore the environment and to protect historic inscriptions. These have been largely successful; however, more effort is needed. At City of Rocks, cooperative efforts have been made among the climbing community, The Access Fund (a national climbers' coalition), and City of Rocks National Reserve managers to mitigate climbing-related impacts. Support by The Access Fund and volunteer work by climbers have contributed to trail stabilization and trailhead improvements. Several new restrooms have been constructed, and climbing information such as trail signing, safety advisories, and an information bulletin board have been established. Members of the climbing community and other Reserve users also assisted in the development of this climbing management plan for City of Rocks National Reserve. Reserve management at City of Rocks encourages an active role by climbers, in harmony with resource stewardship along with all other visitors, who enjoy various recreational activities within the Reserve.

#### **SAFETY**

There are a number of safety risks associated with rock climbing. Among the causes of accidents are climber error, equipment failure and environmental conditions, such as rockfall and adverse weather. While most of the accidents are minor and go unreported, over the past four years there has been a yearly average of four technical climbing accidents resulting in serious injury. However, in comparison to other popular areas, there

have been very few rock climbing accidents at City of Rocks. This is due, in part, to the presence of large, closely spaced bolt anchors, short climbs and solid rock. Risk is an inherent aspect of climbing which climbers seek to varying degrees. Some climbers feel that closely spaced anchors detract from the feeling of challenge and risk that they prefer. The level of risk and benefit to the climber are similar to that sought by participants in other forms of risk recreation.

Climber error is the greatest cause of accidents in rock climbing. Contributing factors include inexperience and carelessness. The risk of possible human error applies to technical rock climbers as well as other Reserve users who scramble on the rocks.

First ascents or attempts with no prior knowledge of a climb usually pose higher risks. In most cases climbers attempting new routes are very experienced. Accurate reporting of routes reduces the risks associated with the unknown on previously climbed routes.

No instances of bolt failure have been recorded at City of Rocks, although the potential will increase as fixed anchors age or are subjected to repeated use-induced stress. The responsibility for maintaining fixed protection continues to rest on the climbing community. There has been some proactive interest by a few climbers to establish an anchor maintenance program and to establish a fund for replacement hardware. Within the guidelines enumerated in this plan, the Reserve allows the replacement of existing anchors by a group or individuals under a permit process.

Both the National Park Service and Idaho Department of Parks and Recreation, who cooperatively manage City of Rocks National Reserve, recognize that climbing poses personal risk to the participants and that climbers bear the sole responsibility for their own safety while pursuing the activity. It is not the intent of this plan, nor of the implementation of any climbing management program at the Reserve, to attempt to judge or physically control safety as it relates to rock climbing, rock climbing equipment, or conditions present on any climbing routes within the Reserve. Management does have the authority, however, to close areas to the public due to specific hazardous circumstances.

## ISSUES AND IMPACTS RELATING TO CLIMBING ACTIVITIES AT CITY OF ROCKS NATIONAL RESERVE

Most of the climbing routes at City of Rocks are less than half a mile from a trailhead. This accessibility tends to intermingle climbers with other types of visitors. In most of the following categories, climbers, presently one of the largest populations of recreational users, appear to be causing a substantial amount of the human impact on the natural environment. As use patterns change, however, changes to the condition of the resource may become more (or less) attributable to other user groups. The mitigation of climbing-related impacts is only one facet of visitor use management at City of Rocks, albeit the most significant.

The identification of climbing-related issues and impacts in this section is based on research conducted at City of Rocks as well as application of relevant research conducted elsewhere. References to trends in the changing condition of resources at City of Rocks are primarily based on field observations and data collected since 1990. The Twin Sisters Resource Study provides baseline data and a methodology for continued resource monitoring to detect tangible climbing-related impacts on the natural resources in the Reserve. (See Appendix F)

### **Disturbance of Wildlife**

Human presence may stress or displace wildlife, particularly during breeding, feeding or resting. Because climbers and cliff-dwelling birds use some of the same vertical space, climbing may specifically affect swallows, raptors and other birds and mammal species. The behavior of cliff-nesting birds has been shown to be affected by human presence when activity is in close proximity to nest sites, above nest sites, or of significant duration. Temporary displacement from nest sites and territorial displays have been observed at City of Rocks in response to human presence. In response to this conflict, Reserve management will take the necessary measures to protect nesting birds including but not limited to, invoking seasonal closures of certain rock formations to prevent human disturbance of raptors during sensitive periods, including nesting season.

### **Threatened and Endangered Wildlife Species**

There are no federally listed threatened or endangered wildlife species in the City of Rocks area. The two candidate species of hawk may be susceptible to disturbance from the presence of climbers on the rock. The bobcat and kit fox, the two sensitive species recognized by BLM and IDFG, could also be affected by human presence, and their habitat use and movement patterns could be altered. This potential impact could be attributed to the occurrence of all types of human activities in the Reserve. This includes climbing activity and climbers hiking to the routes.

Currently, the occurrence of the third candidate, Townsend's big-eared bat, has not been confirmed in the Reserve.

#### **Disturbance of Vegetation/Erosion/Water Quality Impacts (off the rock)**

Human activities in the non-developed areas of the Reserve cause a myriad of interrelated impacts including erosion, vegetation loss, and the derogation of water quality. Erosion, vegetation loss, and soil compaction are evident near roads, on trails, in camping areas, and at the base and staging areas of rock climbing routes. In some cases, the condition is severe and restoration is needed.

Climbers and other hikers in the Reserve originally used trails established by domestic stock. The trail system has been expanded by climbers for access to the rocks. Trail stabilization and rerouting have helped to mitigate many problem areas caused by increased use. Currently, all major trails at City of Rocks have received some degree of maintenance, and a trail plan has been developed to identify future trail construction and stabilization needs.

In preparation for climbs, vegetation at the base of rocks can be trampled, resulting in changes to soil hydrology and exposure of roots. Though most vegetation loss is caused by foot travel or livestock, in some instances, plants or trees have been unlawfully broken, chopped, or sawed at the base of climbs to provide climbers easier access to routes. Reserve trail crews have also impacted vegetation in both the establishment and maintenance of non-motorized trails within the Reserve.

#### **Wetlands and Floodplains**

Wetlands and floodplains are not affected by climbing activity specifically. The consequences of summer flooding may be more severe in some areas due to trail erosion and slope instability caused by use from various types of visitors, including climbers.

The consequences may also be diminished due to trail realignment, design, and the installation of erosion control structures in areas of high recreational use.

#### **Disturbance of Vegetation/Erosion (on the rocks)**

When a new climbing route is established, rock flakes, dirt, lichen, mosses and other vegetation are often intentionally removed from the rock surface along the route. Loose rock is commonly removed by climbers when it is perceived to cause a safety hazard. Route "cleaning," as it is known, is normally done by the first ascent party. In most cases, this is when the most substantial erosion or vegetation loss occurs on the rock. Through repeated ascents of a route and climbers' hands, shoes, and climbing rope coming in contact with the rock, some

additional erosion and vegetation disturbance will occur; however, the rate at which this occurs has not been determined.

New route development has decreased from approximately 300 new climbs in 1988 and 1989 to less than 10 per year since 1990. As a result, route "cleaning" and associated impacts have also subsided, yet the effects on previously established routes continue to accumulate.

In some cases, during the development of a new route, rock has been purposely chipped or drilled to provide finger or toe holds. In other cases at City of Rocks, epoxy has been applied for the purpose of reinforcing holds either during or after the development of a new route. In 1991, an estimated 2% of the established routes at City of Rocks were reported to possess deliberately modified holds. These practices are prohibited in the Reserve, and are enforced through issuing citations to violators.

### **Visual Impacts**

The presence of a person or any article that visibly contrasts with the natural or historic scene may be considered a visual impact.

At City of Rocks, visual impacts relating specifically to climbing may include nylon slings, bolts, chains, chalk residue, or any other item left on the rock which has been abandoned or left in place to facilitate future climbing. The visual impacts of fixed equipment varies depending on location, position, color, type, etc. Most of the fixed climbing equipment at City of Rocks is not camouflaged in any way, but is generally unnoticeable to the casual observer. The presence of climbers or scramblers on the rocks may also be perceived as a visual impact to some observers.

In the interest of protecting the scenic qualities of the Reserve as well as the historic viewshed of the California Trail, a study was conducted on the Twin Sisters to determine the visibility of climbing and the visual impact on the appreciation of these specific values. It was found that climbers on the Twin Sisters were not immediately discernible from the California Trail corridor when the Twin Sisters were positioned in the middle ground and background from the Trail. Therefore, in terms of visual impacts, it is only the management of foreground viewsheds which will be addressed in the climbing management plan. The foreground view, as identified in the City of Rocks Comprehensive Management Plan, was determined as that which is visible within 1/4 mile on either side of the identified route of the California Trail. As part of the Comprehensive Management Plan, the Twin Sisters was included the foreground viewshed of the California Trail Subzone to be managed consistent with the cultural resource protection emphasis of this subzone.

## **Noise**

At City of Rocks, excessive noise is typically attributed to low flying military aircraft, car stereos, or human voices. In climbing, noise is produced during new route development when either hand or power drills are used to install fixed protection. Standard climbing signals are periodically called back and forth between climbing partners for reasons of safety. Noise created by groups of climbers is most common at popular crags during busy weekends. In 1991, a county ordinance was adopted which prohibits the operation of a motor vehicle, motorized toy, or audio device which makes unreasonable noise considering the particular time, place, and conditions in the Reserve.

## **Hardware**

Climbers use many different types of hardware. These can be categorized as either removable protection (i.e. nuts, cams) or fixed (permanent) protection (i.e. bolts, rappel anchors). Pitons, while no longer widely used, may be either removed or left in place on climbs.

The majority of climbs at City of Rocks are face climbs which are equipped with bolts. Rappel anchors at City of Rocks are typically two chains, 4" to 6" in length, attached to bolts. Nylon webbing is also used on rappel anchors, though not as frequently.

Bolted anchors are placed by drilling a hole and inserting an expansion bolt with a metal hanger attached. The bolt holes are usually drilled with portable battery-operated drills. Currently, holes drilled to accommodate bolts are up to 1/2" in diameter and up to 4" deep.

The hardware used on climbing routes is installed and used exclusively by technical climbers. Fixed hardware is installed by the person establishing a new route and may be used by all subsequent climbers. Removable protection is placed and removed during each ascent. The long-term, cumulative environmental effects of using bolts and of replacing them, including their effect on the rate of rock exfoliation, is not known.

It is recognized that a fixed anchor is, in some cases, an essential component of the climber's safety system; in many cases, it is necessary to the pursuit of the activity on a given route. Each bolt represents a small impact to the resource. It is, however, the proliferation of bolts, facilitated by the use of power drills and continued use of hand drills, and the associated impacts of new route development which has presented the greatest climbing-related threats to the natural and cultural resources and values at the City of Rocks.



### **Use of Power Drills**

The use of power drills has permitted the relatively quick and easy placement of approximately 3000 bolts at City of Rocks since 1985.

In 1991, a Cassia County ordinance was enacted which prohibits the use of power drills without permission on public and private property in non-developed areas within City of Rocks National Reserve. This has proven effective in controlling the proliferation of new bolts and climbing routes. It has also provided a workable mechanism to allow the managed use of power drills for the maintenance and replacement of existing bolts, and the screening of new route proposals for resource evaluations. However, since the County ordinance has been enacted to prohibit power drill use, the use of manual hand drills continues to pose resource problems related to damage to rock surfaces.

### **Litter**

Litter may cause undesirable effects on scenic qualities, human health, water quality, and wildlife. At City of Rocks, most users are sensitive to the problem of litter. Since 1990, the installation of trash receptacles in camping and day use areas has helped to curb littering. Roadside litter is still common. Litter associated specifically with climbers typically includes athletic tape and spilled gymnastic chalk.

### **Chalk (magnesium carbonate)**

Gymnastic chalk is used while climbing to dry sweaty hands. At City of Rocks, chalk is used by nearly all technical climbers. White chalk is more difficult to detect on the light colored granitic rock, though on the darker, case-hardened surfaces it can be quite visible. Natural weathering appears to remove most of the chalk except in overhanging and/or protected areas. Some studies suggest that chalk may have a negative effect on the lichen and cause a change in pH.

### **Human Waste**

Uncontained human waste and toilet paper cause unsanitary and unsightly conditions. The problem is attributed to many types of dispersed visitor uses, including climbing. Human waste is sometimes deposited near campsites, trails, and climbing areas. As a result of the addition of new toilet facilities in the Reserve, the problem has decreased.

### **Special Area Designations**

The responsibility of managing areas of special designation require that the purposes, resources and values for the designation be protected. At City of Rocks, special designations

have been assigned both to areas of national significance and scientific interest. Climbing, like all other uses in the Reserve, must be managed to assure the protection of these exceptional areas.

#### Impacts on Special Natural Areas

The National Natural Landmark boundary extends outside of the Reserve boundary but encompasses virtually all of the rock climbing areas at City of Rocks. While climbing in general does not appear to be threatening the resources or values for which the area was designated, monitoring of use levels and trends, as well as the natural resource conditions, is warranted.

The other issues and impacts identified elsewhere in this section must be addressed in the context of appropriate protection of the National Natural Landmark.

The Research Natural Area is managed exclusively for non-manipulative research. Climbing and all other public use is excluded unless a permit is issued for an activity which is being conducted in the interest of geologic or biological research or education. This exclusion precludes any environmental impacts from occurring due to rock climbing, or any other recreational activity.

#### Impacts on the National Historic Landmark

The National Historic Landmark incorporates all but a small northern segment of the National Reserve and includes all of the components of the Reserve's cultural resources. Technical rock climbing and scrambling currently occur on some of the named features in the Landmark designation. Of critical importance, in terms of historic preservation, are the rock formations within the California Trail corridor. Some of these have only recently come into public ownership but with this acquisition, visitors now have the opportunity to walk around some of the register rocks and closely view the historic inscriptions.

Of the 13 register rocks bearing emigrant inscriptions, 10 also possess established climbing routes. Through cooperative efforts with the climbing community and the diminished popularity of these particular climbs, very little climbing currently occurs on the inscription rocks, though climbing and scrambling on the rocks, over the years, has resulted in cumulative adverse impacts. A few inscriptions have been damaged due to climbing traffic. Permanent climbing hardware and residual chalk are noticeable where visitors now make interpretive stops to take a close look at the emigrant names. In the particular case of the register rocks, there is the greatest potential for conflict of interpretative and recreational uses and continued damage to the historic features. Through the implementation of the Comprehensive Management Plan, climbing and scrambling are

prohibited on all inscription rocks on public land within the Reserve.

The Twin Sisters are another of the significant historic features associated with the California Trail within City of Rocks. It was the single most frequently identified landmark within the City of Rocks noted by California Trail emigrants in their diaries, and reminiscences, and it remains a symbol of the City of Rocks to contemporary local residents. Along with the Register Rocks, the formation is one of the most important components within the Reserve's California trail corridor, which has been set aside as a separate management zone in the Comprehensive Management Plan to preserve the opportunity to experience a segment of the trail in a setting which retains the feeling and association of the original migration era. It has long been a focus of preservation efforts, initially to obtain designation as a unit of the National Park System. The presence of these qualities of association and feeling were important attributes of the City of Rocks in meeting the criteria for establishing the integrity of sites proposed for designation as National Historic Landmarks. Preservation of these intangible qualities is as critical to protecting the integrity of the landmark as is preserving its actual physical features. The Plan recommends that the California Trail Management Subzone be managed exclusively to protect these cultural values, and be closed to climbing and other active recreational uses which would adversely impact these values. This recommendation is consistent with comments of the Idaho State Historic Preservation Officer and the Advisory Council on Historic Preservation, which supported the establishment of the California Trail Management Subzone and the incorporation of the Twin Sisters within the zone, during the consultation process conducted by the National Park Service as required under Section 106 of the National Historic Preservation Act.

#### **Social and Socio-Economic Impacts**

A social impact is something that influences the way a person or group interacts with others or it may affect a personal experience. At City of Rocks, there have been very few user surveys, and no specific sociological studies are available. Numerous public meetings regarding the Reserve have disclosed that social impacts are of great concern to most of the users and landowners. All are currently affected by the period of transition in the management and use of the City of Rocks, and most of the issues involve a great deal of emotion. With the demands from increased visitation comes a social and economic effect on the region, county, and surrounding rural communities.

The following is a partial list of those who may be affected by climbing related activities or their management:

- 1) Private Landowners - As of October, 1997, approximately 4,800

acres of the land in City of Rocks National Reserve was privately owned, including some of the historic inscription rocks and most of the California Trail that is within the boundaries of the Reserve. Consequently, private property owners have a number of significant concerns relating to public use of the Reserve, including trespassing, liability, and destruction of property. There is a pressing need for consistent communication and cooperation between government agencies, user groups and the owners of private lands within the Reserve.

In addition to some of the impacts discussed elsewhere in this document, landowners have identified the following problems associated with visitor use at City of Rocks:

- \* Damage to fences, vegetation and water sources has occurred.
- \* Visitors' dogs have chased cattle.
- \* No Trespassing signs frequently are not obeyed.
- \* Dealing with increased visitation and government agencies causes anxiety, stress, and the need to seek legal advice.
- \* Gates have been left open, necessitating the addition of locks.
- \* Trail erosion is a greater concern due to increased visitor traffic.

Landowners note these problems specific to scrambling, climbing, and new route development:

- \* Climbing on some of the inscription rocks has accelerated deterioration of inscriptions. An example is on the Chicken/Pagoda/Elephant Head rock complex.
- \* Concern over liability has prompted one individual landowner to consider banning climbing on their property.
- \* Bolts, slings, (other equipment) and rock damage are visual impacts.

2) Area Residents - Residents of the surrounding communities are interacting with large numbers of climbers from outside of the area and are faced with a new demand for goods and services.

3) Climbers - Diverse in climbing techniques and perspectives, some find themselves with philosophical differences which affect experiences and interaction among climbers. Perceived crowding and anxiety over future management of the Reserve are key social issues.

4) Commercial Operations - Climbing schools are experiencing an increase in demand for instruction and guiding. The increase in activity affects not only the client(s) and guide(s) but also other climbers. At City of Rocks, guides are now required to comply with applicable laws governing commercial operations.

5) Other Users - Other visitors have been forced to adjust to the increased number of climbers present. Visitors who have not traveled to the Reserve to climb can be faced with competing for recreational opportunities such as primitive camping and solitude within the Reserve.

6) Reserve Managers - Planning and implementing climbing management, including public participation, and managing the effects on other users, will require a commitment of resources and funding. Staffing, training, and equipment for search and rescue and emergency medical services also increases the demands on Reserve staff.

## THE TWIN SISTERS RESOURCE STUDY

### Introduction

The Twin Sisters Resource Study was initiated in March of 1993 in response to concerns regarding technical rock climbing activities on the two prominent rock spires located in the southern portion of City of Rocks National Reserve. Twin Sisters is not only an attractive rock climbing area but it is also one of the important features of the area's National Historic Landmark designation due to its association with the California Trail. Given this special status and the inclusion of this feature within the City of Rocks National Reserve, comes the responsibility of assuring that public use will not derogate the natural features and cultural value of Twin Sisters.

### Project Summary

The purpose of the Twin Sisters Resource Study was to evaluate the effects of rock climbing on and immediately adjacent to the formation and to make a determination of what effect, if any, climbing has had on the natural and cultural values of the feature. As stated in a March 24, 1993, memorandum from then National Park Service Regional Director Charles Odegaard, the study was intended to "form the basis for a long-term management decision as to whether climbing and other recreational impacts warrant the permanent closure of the Twin Sisters to climbing, or allow such use with certain conditions and restrictions". Components of the resource study were:

- 1) an evaluation of the natural resource significance of the feature
- 2) an evaluation of the cultural resource significance of the feature
- 3) an assessment of any resource degradation caused by past and present climbing use

- 4) recommendations concerning actions that may be taken by park management to mitigate or minimize future climbing impacts on the Twin Sisters

During the 1993 field season, the baseline condition of Twin Sisters was documented, a photographic analysis was conducted, and a climbing history was compiled. The comprehensive nature of the Twin Sisters Resource Study provided an excellent opportunity to develop and refine a methodology for monitoring natural resource conditions of the feature. The study provides a model for future climbing-related resource monitoring at City of Rocks.

By July 1994, the study tasks were accomplished. The findings and recommendations were presented to the NPS Pacific Northwest Regional Director and the Idaho Department of Parks and Recreation Director for a decision which would be incorporated into the City of Rocks National Reserve Comprehensive Management Plan. The conclusions of the study are summarized below:

- 1) An evaluation of the geologic resource significance of the feature revealed that, as in their lithologic characteristics are not unique to City of Rocks or the region. It is the juxtaposed position of the two similarly shaped landforms of two different rock types of vastly different ages that provides significant geologic interest. The geologic resource significance associated with Twin Sisters has not been affected by climbing activity on the formation.

- 2) The assessment of geologic resource impacts caused by climbing use did not reveal any trends which suggest eventual impairment of the natural state of Twin Sisters if rock climbing were to continue on the formation.

- 3) Regarding visual resources, the presence of climbers or climbing equipment was found to have no significant visual impact in the middle ground or background when viewed from the California Trail.

- 4) An evaluation of the cultural resource significance, based primarily on existing studies, including the National Historic Landmark documentation, revealed that the Twin Sisters is one of the most important features of the California Trail within City of Rocks. It has documented historic significance and potential ethnographic significance. It is one of the components which provide the unique opportunity to experience a segment of the California Trail in a setting which retains the feelings and association of the original migration era. Through research conducted in association with the Twin Sisters study, numerous

migrant journal entries were found which refer to Twin Sisters or its vicinity.

In order to preserve the significant cultural elements which define the Reserve's integrity as a Historic Landmark, it was recommended that Twin Sisters be closed to climbing and all recreational use be managed exclusively to protect its cultural value. If recreational climbing use were to be allowed on the Twin Sisters, it would have an adverse impact upon historic resources and the visitor experience of those resources. This recommendation took into account the comments provided by the Idaho State Historic Preservation Officer and the Advisory Council on Historic Preservation. The comments of these two offices were provided through the consultation process required under Section 106 of the National Historic Preservation Act.

5) The California Trail segment within the National Reserve is identified as a significant and uniquely intact resource, that allows contemporary visitors to experience the California Trail much as their emigrant predecessors did.

**GENERAL MANAGEMENT ZONING**  
**FOR CITY OF ROCKS NATIONAL RESERVE**

Planning policies require all units of the National Park System to delineate management zones to provide guidance to park managers concerning resource protection and management, visitor use management, and development.

Congress directed that the Comprehensive Management Plan for City of Rocks National Reserve should identify those areas or zones that would most appropriately be devoted to historic and natural preservation, public use and development, and private use, in keeping with the protection of the historic rural setting.

Strategies for managing climbing activities at City of Rocks must support the management zoning delineated and defined in the Comprehensive Management Plan. The zones, subzones and areas are listed below, with selected excerpts from the Comprehensive Management Plan's description of the zones, which provided guidance for the development of climbing management alternatives outlined in this plan. Statements from the Comprehensive Management Plan with particular reference to the management of recreation or, more specifically, climbing, are shown in italics (emphasis added).

**Historic and Natural Preservation Zone**

**1. California Trail Subzone:** *Emphasis on preserving and interpreting outstanding features (major landmarks including Twin Sisters, trail remnants, inscription rocks, encampment area, California Trail corridor).*

*Recreation uses not directly associated with the access or the enjoyment and interpretation of the California Trail would generally be precluded within the foreground viewshed of the California Trail. This would eliminate climbing opportunities where the activity would be visible from approximately 1/4 mile on each side of the California Trail. To Comprehensive Management Plan protect outstanding features, climbing and scrambling would be prohibited on historic inscription rocks, Twin Sisters, Pinnacle Pass and other features that have cultural significance.*

**2. Natural Area Subzone:** *Emphasis on preserving exceptional natural resource values and providing recreational opportunities where appropriate. Three management areas were identified:*

*a. Research Natural Area: Activities restricted to nonmanipulative research, education, and other activities that would not detract from the area's research values (as per NPS-77 guidelines). Public use excluded except by permit.*



b. General Natural Area: Protect natural resource values and provide for a level of public and private use that does not degrade the natural qualities of the area. The area would be subject to more intense natural resource monitoring and management than other areas to ensure that sensitive habitats were not degraded.

c. Natural and Recreational Resource Area: Emphasis on balancing recreational use with the protection of natural resources. Opportunities for more intense resource-based day recreation would be provided in the western arm of the rock crescent which contains many of the most popular areas for rock climbing, hiking, picnicking and camping.

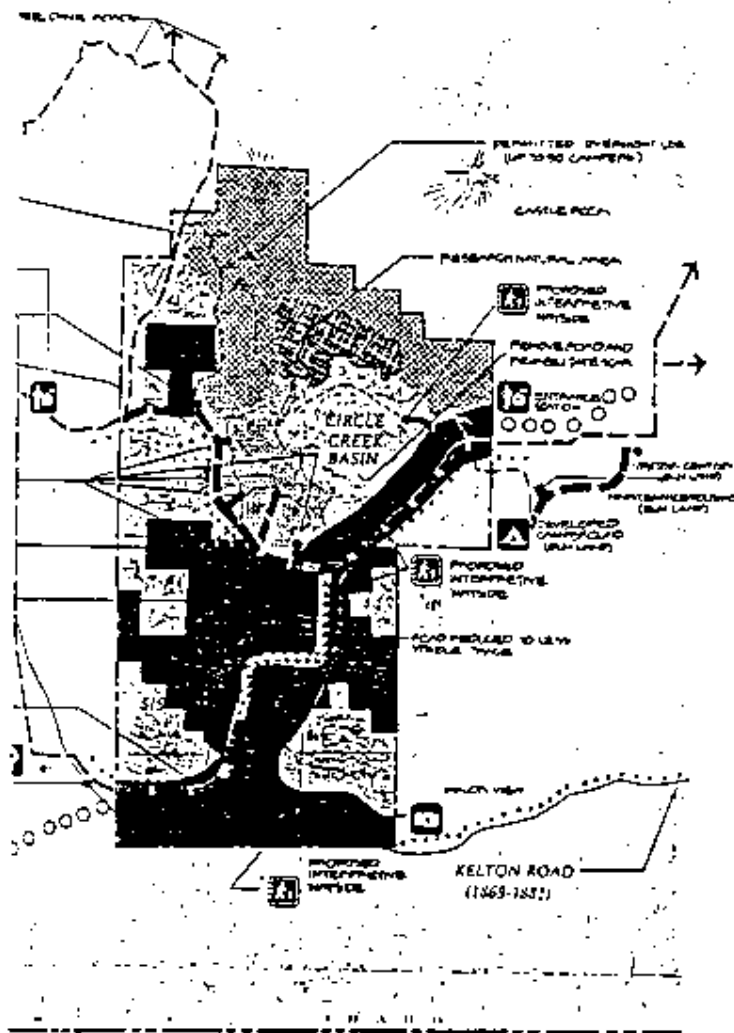
#### **Historic Rural Setting Zone**

The intent would be to preserve the historic rural setting and to perpetuate ongoing ranching activities that captured the rural character of the Reserve at the time of its establishment.

Appropriate recreation, including day uses, such as hiking, informal picnicking, photography, nature viewing and climbing would be permitted. Since much of this zone is in private ownership, the public would be directed to seek the owner's permission prior to entering private land.

#### **Public Use and Development**

Only those modest facilities essential to visitor enjoyment of resources, such as access roads, parking pull-offs, trails, picnic sites, primitive campsites and toilet facilities would be included in the Reserve.



# MANAGEMENT ZONING CITY OF ROCKS NATIONAL RESERVE UNION STATE DEPARTMENT OF THE INTERIOR NATIONAL PARK SERVICE 000 - 0001A - OSC - AUGUST 93

## HISTORIC AND NATURAL PRESERVATION ZONE

### CALIFORNIA TRAIL SUBZONE

- FOREGROUND OF CALIFORNIA TRAIL
- GENERAL USE

### NATURAL AREA SUBZONE

- RESEARCH NATURAL AREA
- GENERAL NATURAL AREA
- NATURAL AND RECREATIONAL RESOURCE AREA

### HISTORIC RURAL SETTING ZONE

- PRIVATE LAND
- PUBLIC LAND

### PUBLIC USE AND DEVELOPMENT ZONE

- GRAVEL ROAD (SPUR)
- RANCH ROAD
- WAGON ROAD
- TRAIL

### EXISTING FEATURES

- CALIFORNIA TRAIL CORRIDOR
- LIVESTOCK TRAILING CORRIDOR
- SALT LAKE ALTERNATE TRAIL
- BEST PRESERVED WAGON RUT REMNANT
- PASSES ON TRAIL
- NATIONAL RESERVE BOUNDARY



## CLIMBING MANAGEMENT PLAN FOR THE CITY OF ROCKS NATIONAL RESERVE

The prescription for climbing management at City of Rocks National Reserve integrates certain elements from a permit and regulatory system approach, with the principles of the Reserve's general management zoning, as defined in the City of Rocks Comprehensive Management Plan. By adopting this approach, recreational climbing use will be managed with the primary intent to protect the resources and values of the Reserve, while providing for an appropriate level of public recreational climbing use and enjoyment.

Resource monitoring and protection, public education, communication, and the strengthening of partnerships will be important components of the City of Rocks climbing management program. This approach will provide the mechanisms to accomplish the goals and objectives set forth in this plan and fully meet the intent of the Comprehensive Management Plan.

### **General Management**

\* Resource monitoring will be the foundation of this management program to ensure that objectives are being met and to indicate when changes in the management approach are warranted. Resource monitoring will be consistent with the objectives and strategies defined in the City of Rocks. Resources Management Plan and will focus on the condition of the resources and social factors, rather than emphasizing climbing-related studies. Exceptions may be for scientific research or in instances where the cause of resource derogation is suspected to be activity-specific.

\* Implementation of the climbing management program will warrant the continued staffing of a climbing ranger at City of Rocks. Climbing program coordination will also involve resource management, maintenance, interpretation, visitor protection, and emergency services functions. A work plan will be prepared annually to define short-term climbing management priorities.

\* Current regulatory authorities are considered adequate for the implementation of this program. This strategy does not propose new climbing-specific regulations at City of Rocks. Long-term closures or restrictions of specific areas (i.e. Twin Sisters, Research Natural Area) would be addressed through regulations pertaining to all recreational use. Any new federal regulations or National Park Service directives pertaining to climbing activities would be applied at City of Rocks.

\* The effectiveness of this proposal will rely, in part, on a comprehensive climber education program and the strengthening of partnerships between the Reserve management, private landowners, as well as individual members and organizations from the climbing, environmental, and historic preservation communities,

and other interested parties. Education is a critical component of any visitor use management program. In many cases, resources and values are negatively impacted due to a lack of understanding regarding appropriate uses of an area. At City of Rocks, climbers, managers, and other interested parties could all benefit from a shared knowledge of the activity, the area and resources involved, climbers' concerns and perceptions, and management's objectives and constraints. Therefore, visitor education can be an important tool in helping to achieve voluntary compliance with the resource protection and visitor experience goals of the Reserve. Suggested aspects of the education component are outlined in plan and will also be integrated into a Reserve-wide Interpretive Prospectus.

- \* Many visitors come from other countries, and some are not fluent in English. To address this issue, the climbing program will need to provide multi-lingual materials and information to help achieve educational objectives.

- \* The Climbing Management Plan for City of Rocks National Reserve is intended to be a dynamic document. A review to determine the need for any potential revisions would be initially conducted two years after the approval of the Climbing Management Plan. Subsequent reviews and revisions to the plan would be made as needed.

#### **Prohibited Climbing Related Activities**

- \* The use of all drills and bolting equipment (power and manual, and other types of power equipment) is prohibited without permission from the City of Rocks National Reserve Manager, or appropriate private landowner. (See Appendix B)

- \* Gluing or chipping rock, gluing or otherwise affixing artificial holds on rock, or any other damaging practices, such as forcibly prying off rock or destroying vegetation to enhance a route, is prohibited.

- \* Removal of existing fixed anchors, which results in disturbance or damage to the rock or vegetation, is prohibited.

- \* Guiding, instructing, or other commercial activities without an Idaho Outfitter and Guides License and Special Use Permit issued by City of Rocks National Reserve is prohibited.

## CLIMBING-RELATED PROVISIONS BY GENERAL MANAGEMENT ZONES

(See map of general management zones and definitions of management zones on pages (Add page numbers here)).

See also Appendix A for list of climbing rocks in each zone)

### **Historic and Natural Preservation Zone**

1. California Trail Subzone: Climbing within the Subzone is prohibited as follows:

\* Climbing (or scrambling) on any surface of inscription rocks is prohibited. Fixed anchors will be removed from Signature Rocks unless removal would result in damage to the rock. Where it was not possible to remove anchors, remaining hardware would be camouflaged.

\* Climbing (and other than incidental recreational use) within the foreground viewshed of the California Trail is prohibited. The foreground of the California Trail area is approximately 1/2 mile wide along most of the trail corridor but also includes the Twin Sisters formation.

\* Climbing (and other than incidental recreational use) is prohibited on the two spires of the Twin Sisters formation. The closure would be posted, and may be delineated by a fenced area near the base of the formation.

The establishment of new climbing routes within the California Trail Subzone will be prohibited.

### 2. Natural Area Subzone:

a. Research Natural Area: Climbing (and all other use) is prohibited, unless a permit is obtained for an activity consistent with the area's purpose of being managed for non-manipulative geologic or biological research and education.

b. General Natural Area: Climbing is allowed.

Resource monitoring will be conducted in the interest of maintaining sensitive habitats. The management of climbing (and other public use) could be affected by the findings of resource studies and the need to maintain or restore particular natural resource qualities in this area.

c. Natural and Recreational Resource Area: Climbing is allowed.

Resource monitoring will be conducted in the interest of maintaining sensitive habitats. The management of climbing (and other public use) could be affected by the findings of

resource studies and the need to maintain or restore particular natural resource qualities in this area.

Maintenance standards for trails and facilities near popular climbing areas will be increased. Opportunities for cooperative projects will be available. Signage and climber information will be increased.

#### **Historic Rural Setting**

Climbing is allowed on public land. Seasonal closure during raptor nesting when warranted.

Climbing on private property is subject to the landowner permission.

## THE EDUCATION COMPONENT OF THE CLIMBING MANAGEMENT PLAN

The effectiveness of the proposed action would rely, in part, on a comprehensive climber education program and the strengthening of partnerships between the Reserve management, private landowners, as well as individual members and organizations from the climbing, environmental and historic preservation communities, and other interested parties. Suggested elements of the educational program are outlined here and would also be integrated into a Comprehensive Interpretive Plan developed for the educational and interpretive needs throughout the Reserve.

### **Education Topics**

- \* Minimum Impact Climbing
  - Discourage proliferation of fixed anchors
  - Minimize use of chalk
  - Encourage use of neutral colored equipment
  - Encourage minimum impact climbing techniques throughout the Reserve.
- \* Reserve Guidelines/Regulations
  - Communicate zone boundaries/restrictions/guidelines
  - Communicate safety and other use information
  - Communicate pertinent Reserve regulations
- \* Respect for Private Property
  - Educate public on public & private property boundaries and ethics
  - Educate public on standards of behavior around stock and fenced rangeland
  - Encourage communication with private property owners prior to using or crossing private land
- \* Natural Resource Protection
  - Promote pack it in/pack it out philosophy
  - Protect wildlife from disturbance by recognizing defensive behavior and respecting closures
  - Protect vegetation and prevent erosion by using established trails, roads and campsites
  - Protect water sources from litter and human waste
  - Camp in designated sites. Use existing restrooms and fire rings. Purchase wood or bring from outside Reserve
- \* Respect for other Reserve users
  - (- i.e. climbers, sightseers, history buffs, private landowners, hikers, bikers, etc.)
- \* Conflict Resolution
  - Address user group conflicts, landowner/user group conflicts, management of Reserve policies and their effect on user groups, through communication

- \* Interpretive Programs for Climbing Community
  - Provide historical information
  - Provide natural resources education
  - Provide climbing information and education

#### **Methods of Providing Education**

- \* Signage
  - In locations such as private property, Reserve entrances, camping and picnic facilities, outhouses, parking areas, visitor's center etc.
- \* Employee Contacts
  - Formal presentations
  - Proactive contact between rangers and public
  - Correspondence with potential user groups
  - Phone contacts
- \* Audio-Visual
  - Formal presentations in Visitor's Center
  - Formal presentations available to groups prior to use of Reserve
- \* External Contacts
  - Climbing publications - magazines, guidebooks
  - Climbing organizations - national and local
  - Commercial organizations - guides, retailers, schools, gyms, etc.
  - Non-Profit organizations - Scouts, church groups, public safety groups
- \* Climbing Information Forum
  - Member make-up similar to the Public Working Group of the Interim Climbing Management Plan Team (See List of Persons and Agencies Consulted)
  - Conflict resolution forum
  - Communication/education forum
  - Review/advisory forum on effectiveness of climbing policy
  - Forum for cooperative projects within the Reserve



**LIST OF KNOWN CLIMBING FORMATIONS BY MANAGEMENT ZONE**

**ROCKS OPEN TO CLIMBING**

**A. NATURAL AND RECREATIONAL RESOURCE AREA**

**Upper City/Breadloaves Area:**

|                   |                    |
|-------------------|--------------------|
| Finger Rock       | Go West            |
| Upper Breadloaves | Lower Breadloaves  |
| Owl Rock          | King On The Throne |
| The Mall          | The Camel          |
| Eric Wood         |                    |

**Parking Lot Rock Area:**

|                       |                            |
|-----------------------|----------------------------|
| Parking Lot Rock      | The Anteater               |
| Morning Glory/Incisor | Creekside/office etc.      |
| Peter Pan Boulder     | Bad Boy                    |
| Turkey Vulture Rocks  | Rabbit Rock                |
| Buzzard Perch         | Blockhead                  |
| The Real Rabbit Rock  | Window Rock                |
| Animal Cracker Dome   | Hangdog Dome               |
| The Clamshell         | Drilling Fields/Lost World |

**Center City Area:**

|                 |                                   |
|-----------------|-----------------------------------|
| The Wart        | Bath Rock                         |
| Obvious Wall    | Out to Pasture                    |
| Nematode        | Your Own Private Idaho            |
| Practice Rock   | Lookout Rock                      |
| Prospector Wall | Elephant Rock (south 1/2 private) |

**Inner City Area:**

|                     |                 |
|---------------------|-----------------|
| Flaming Rock        | Slabage Patch   |
| Bumblie Wall        | The Transformer |
| California Corridor | Puzzle Rock     |

**Circle Creek Basin:**

|               |                |
|---------------|----------------|
| Odyssey Wall  | The Boxtop     |
| Lost Arrow    | No Start Wall  |
| Mushroom Rock | Orange Wall    |
| Stripe Rock   | Slash Rock     |
| Heartbreaker  | The Laboratory |

**B. GENERAL NATURAL AREA**

|                 |           |
|-----------------|-----------|
| Shangri-La      | The Camel |
| Chinaman's Head |           |

### C. CALIFORNIA TRAIL SUBZONE

#### Circle Creek Basin:

Building Blocks                      The Toadstool  
Ranch Outcrops (Some on Private Property)

#### Twin Sisters Area:

Nausea Wall                              B.F.D. Rock  
BLM Corridor                            Bulldog Wall  
Outhouse Slab                           Picnic Dome

### ROCKS CLOSED TO CLIMBING

### D. RESEARCH NATURAL AREA

#### Special Use Permit Required:

Grey Wall                                The Tower  
Granite Mountain                       Roadmap Wall

#### PRIVATE PROPERTY

Access Prohibited Unless Authorized by Landowner:

|                                       |                      |
|---------------------------------------|----------------------|
| The Gallstone                         | Checkered Demon      |
| Vital Signs                           | Mt. Everest          |
| The Dungeon                           | Electric Avenue      |
| The Dolphin                           | The Frog             |
| Featured Wall                         | American Eagle Rocks |
| The Rookery                           | Skinner's Roof       |
| White Lightening                      | Weather Wall         |
| Yellow Wall                           | Mississippi Fred's   |
| Needle Rock                           | North Wall           |
| Secret Tom's                          | Bobcat Rock          |
| Crystal Cow                           | Inner Circle         |
| Eagle Rock                            | The Flintstone       |
| Elephant Rock (south 2)               | Go West (north 2)    |
| Ranch Outcrops (some on private land) |                      |

### INSCRIPTION ROCKS

|               |                  |
|---------------|------------------|
| City Limit    | Chicken Rock     |
| Elephant Head | Camp Rock        |
| Monkey Head   | Kaiser's Helmet  |
| Treasure Rock | Devil's Bedstead |
| Register Rock | The Dome         |

### HISTORIC ROCKS

South Sister

Higher Sister (Eberhorn)

**SPECIAL CONDITIONS FOR COMMERCIAL GUIDING**  
**AT CITY OF ROCKS NATIONAL RESERVE**

Commercial operations for rock climbing activities in City of Rocks National Reserve are authorized under a Special Use Permit (SUP), issued by the Superintendent at City of Rocks National Reserve, acting on behalf of the National Park Service, and in cooperation with the Idaho Outfitter and Guides Licensing Board.

Acquisition of a state license is required prior to the issuance of the SUP. The renewal of the permit and the license will be based on a coordinated review by both agencies.

In addition to the general provisions of the SUP (contained in article IV of the NPS-IDP&R Memorandum of Understanding), the following special conditions shall apply to all commercial licensees who are guiding or instructing rock climbing activities in the Reserve:

Camping is restricted to designated campsites, available on a first come, first serve basis. Large groups are encouraged to camp in areas which can accommodate the group size without damaging the resource and must not exceed the number of campers allowed per campsite. During certain high-use periods, this may necessitate that a group camps outside the Reserve.

Wheeled vehicles are restricted to existing roads and parking areas.

Campfires are discouraged but if used, they are to be restricted to established fire rings and grates.

Firewood must be purchased or brought in from outside the Reserve. No collecting of firewood is permitted in the Reserve.

The licensee is required to obtain the permission of the landowner to use or cross private property.

Intentional alteration of the rock or the injury or removal of vegetation is prohibited.

The use of existing permanent climbing protection is based on the judgment of the licensee or the licensee's agent.

The installation of any permanent hardware (i.e. bolts or pitons) is prohibited without the permission of City of Rocks Superintendent.

Chalk use in class instructional situations is prohibited.

All webbing shall be removed wherever possible from anchors after use. If it becomes necessary to leave webbing in place for a descent, it shall be of a neutral color and positioned so as not to be easily seen by the casual viewer.

Safety equipment is to be used by all clients and guides when on the rock or in the drop zone. The condition and correct use of the equipment is subject to inspection by City of Rocks National Reserve's representative.

It is the responsibility of the licensee to ensure that other people are not endangered due to the activities being conducted under the SUP.

Minimum impact climbing practices and an awareness of the environmental values in the National Reserve are to be conveyed to all clients of the licensee when operating in City of Rocks National Reserve.

The licensee is responsible for ensuring that commercial operations are conducted in accordance with regulations for City of Rocks National Reserve and within the guidelines of the Climbing Management Plan.

Operations under the SUP License are subject to inspection by a representative of City of Rocks National Reserve. Any deficiencies observed or violations of the terms of the SUP will be documented and the licensee will be notified in writing. A copy of the notification will also be furnished to the Idaho Outfitter and Guides Licensing Board. The licensee will have 10 days to address the deficiencies and take corrective action.

#### **Environmental Consequences of the Plan**

During the identification of issues and impacts of the proposed action identified in the Draft Climbing Management Plan and Environmental Assessment, a Finding of No Significant Impact was concluded. It was determined that climbing activities would not impact any threatened or endangered species at City of Rocks, nor any wetlands or floodplains. Climbing use done in accord with this plan would not impact the National Natural Landmark status of the Reserve, and is a generally precluded use in the Research Natural Area. For a summary of the impacts of the proposal see Appendix D.

## CLIMBING MANAGEMENT PLAN

### Production Team

Maura Longden, National Park Service, former City of Rocks National Reserve Climbing Ranger, Almo, ID. ICMP

Brad Shilling, Idaho Department of Parks and Recreation, City of Rocks Climbing Ranger, Almo, ID

Wallace Keck, Idaho Department of Parks and Recreation, Chief Ranger, City of Rocks National Reserve

Ned Jackson, Idaho Department of Parks and Recreation, Superintendent, City of Rocks National Reserve, Almo, ID

Keith Dunbar, National Park Service, Team Leader, Planning and Partnerships Team, Columbia Cascades Support Office, Seattle, WA

Arlene Yamada, National Park Service, Administrative Assistant, Planning and Partnerships Team, Columbia Cascades Support Office, Seattle, WA

### The Public Working Group for the Interim Climbing Management Plan, 1991

Dave Bingham - Author of City of Rocks, Idaho - A Climber's Guide. Long-time City of Rocks climber and route developer, climbing guide and outdoor program instructor, founding member of "Friends of City of Rocks, Inc.", City of Rocks V.I.P. Ranger (1987), climbing experience in North America, Australia, Europe and Asia, 27 years climbing experience

Dave Daams - Park Ranger, Idaho Department of Parks and Recreation, City of Rocks National Reserve.

Bob Dunnagan - Former Assistant Superintendent for natural resources planning at Mount Rainier National Park, 33 year veteran of the National Park Service, having worked in many western mountain parks and central offices, active climber/mountaineer and park ranger involved with climbing activities for more than 20 years of his career.

Jean Elwell - Private landowner within City of Rocks National Reserve, member of the Nicholson family whose history includes almost 60 years of ranching in the City of Rocks and who owns many popular climbing rocks, currently writing a book on History of City of Rocks.

Mead Hargis - M.S. degree candidate in environmental planning, Utah State University, Utah, B.S. degree in biology, UC Berkeley,

CA, currently conducting research into policy to resolve climbing/resource conflicts on public lands, climber, and former NPS ranger in Yosemite for 12 years dealing with climbing and resource management, former Litigation Coordinator on the Mono Lake Committee, former Director of the Mono Lake Foundation.

Maura Longden - ICMP Chairperson/Facilitator, City of Rocks National Reserve Climbing Ranger, Park Ranger for 19 years, climber for 22 years, international guide, climbing experience in U.S., Canada, France, Switzerland, Asia, Argentina and New Zealand.

Carol Kotchek - City of Rocks climber for 13 years, established new climbing routes, climbing experience throughout the western U.S. and in Europe, organized 1989 City of Rocks climber's meeting which adopted voluntary climber's code and self regulation.

Dean Sangrey - Executive Director of Idaho Outfitters and Guides Licensing Board, involved in the licensing and evaluation of commercial guiding activity at City of Rocks National Reserve as well as throughout the state of Idaho.

John Steiger - Representative of The Access Fund and member of The Access Fund's National Advisory Council, attorney specializing in public land law, 23 years of climbing experience, six at City of Rocks, former Assistant Editor of Climbing magazine.

Dr. Merle Wells - Retired Idaho State Historical Society Historian, recognized authority on the California Trail history, transportation routes, ranching history, and historical preservation, involved in historic resources investigations at City of Rocks for more than 30 years, involved in review of federal actions which may affect National Historic Landmark designation.

Anna Witesman - Freelance writer and editor, hiker/climber (Rocky Mountains, Western U.S. and Alaska), present focus: outdoor activity with children including several trips each year to City of Rocks. First climbed at City of Rocks in 1971, strong interest in geology, botany, and local history.

Fred Witesman - Active rock climber and mountaineer since 1969, City of Rocks climber since 1983, climbing experience in North America, United Kingdom, Alaska, European Alps and Asia, MRA search and rescue team member, mountaineering and avalanche instructor.

Steve Wolper - Representative of the Idaho Conservation League, member of The Wilderness Society, 31 years of climbing experience, first climbed at City of Rocks in 1967, Ketchum resident for 19 years.

List of Persons and Agencies Consulted

Advisory Council on Historic Preservation  
Sam Davidson - The Access Fund  
Yvonne Ferrell, Director, Idaho Dept. of Parks and Recreation  
John Hill - Idaho State Historic Preservation Officer  
Ned Jackson - Park Manager, Idaho Dept. of Parks & Recreation  
Larry Jones - Idaho Historical Society  
Kathy Jope - Lead of Natural Resources Team, NPS-CCSO  
Michael Nicholson - Private landowner, City of Rocks NR  
Oregon and California Trail Association  
Dave Pugh - Former Superintendent, City of Rocks National  
Reserve, National Park Service  
Bob Rosso - Idaho Outfitters and Guides Licensing Board  
Allen Sanderson - The Access Fund  
Scott Tyson - ISU Outdoor Program & Friends of City of Rocks

Other Land Managers Consulted

National Park Service, Division of Ranger Activities,  
Washington, DC  
Rocky Mountain National Park, CO  
Pinnacles National Monument, CA  
Joshua Tree National Monument, CA  
Devil's Tower National Monument, WY  
Yosemite National Park, CA  
Eldorado State Park, CO  
Boulder Mountain Parks, CO

## APPENDIX A

### CITY OF ROCKS ENABLING LEGISLATION

## APPENDIX A: LEGISLATION

PUBLIC LAW 100-696 (S. 2848) November 18, 1988

### ARIZONA-IDAHO CONSERVATION ACT OF 1988

*An Act to provide for the designation and conservation of certain lands in the States of Arizona and Idaho, and for other purposes.*

*Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That this Act be cited as the "Arizona-Idaho Conservation Act of 1988"*

#### TITLE I—SAN PEDRO RIPARIAN NATIONAL CONSERVATION AREA

##### ESTABLISHMENT OF SAN PEDRO RIPARIAN NATIONAL CONSERVATION AREA

SEC. 101. (a) **ESTABLISHMENT.**—In order to protect the riparian area and the aquatic, wildlife, archeological, paleontological, scientific, cultural, educational, and recreational resources of the public lands surrounding the San Pedro River in Cochise County, Arizona, there is hereby established the San Pedro Riparian National Conservation Area (hereafter in this title referred to as the "conservation area").

(b) **AREA INCLUDED.**—The conservation area shall consist of public lands as generally depicted on a map entitled "San Pedro Riparian National Conservation Area—Proposed" numbered AZ-040-02, dated January 1988, and consisting of approximately 56,431 acres.

(c) **MAP.**—As soon as is practicable after enactment of this title, a map and legal description of the conservation area shall be filed by the Secretary of the Interior (hereafter in this title referred to as the "Secretary") with the Committee on Interior and Insular Affairs of the House of Representatives and the Committee on Energy and Natural Resources of the United States Senate. Each such map shall have the same force and effect as if included in this title. Such map shall be on file and available for public inspection in the Office of the Director of the Bureau of Land Management, Department of the Interior, and in the Bureau of Land Management offices of the State Director for Arizona, and the district office responsible for the management of the conservation area.

##### MANAGEMENT OF CONSERVATION AREA

SEC. 102. (a) **GENERAL AUTHORITIES.**—The Secretary shall manage the conservation area in a manner that conserves, protects, and enhances the riparian area and the aquatic, wildlife, archeological, paleontological, scientific, cultural, educational, and recreational resources of the conservation area. Such management shall be guided by this title and, where not inconsistent with this title, by the provisions of the Federal Land Policy and Management Act of 1976 (hereinafter in this title referred to as "FLPMA").

(b) **USES.**—The Secretary shall only allow such uses of the conservation area as he finds will further the primary purposes for



preparation and implementation of the comprehensive, long-range plan required pursuant to section 103 of this title.

(b) REPRESENTATION.—There shall be 7 members of the Committee, who shall be appointed by the Secretary. Members of the Committee shall be appointed for terms of three years, except that of the members first appointed 2 shall be appointed for terms of 1 year and 3 shall be appointed for terms of 2 years. The Secretary shall appoint one member from nominations supplied by the Governor of the State of Arizona, and one member from nominations supplied by the Supervisors of Cochise County, Arizona. The other members shall be persons with recognized backgrounds in wildlife conservation, riparian ecology, archeology, paleontology, or other disciplines directly related to the primary purposes for which the conservation area was created.

#### LAND ACQUISITION

Sec. 105. The Secretary may acquire lands or interests in lands within the boundaries of the conservation area by exchange, purchase, or donation, except that any lands or interests therein owned by the State or local government may be acquired by donation or exchange only. Any purchase or exchange of lands to be added to the conservation area shall require the consent of the owner of those lands or rights.

#### REPORT TO CONGRESS

Sec. 106. No later than five years after the enactment of this title, and every ten years thereafter, the Secretary shall report to the Committee on Interior and Insular Affairs of the House of Representatives and the Committee on Energy and Natural Resources of the United States Senate, on the implementation of this title. Such report shall include a detailed statement on the condition of the resources within the conservation area and of the progress of the Bureau of Land Management in achieving the purposes of this title.

#### AUTHORIZATION

Sec. 107. There are hereby authorized to be appropriated such sums as may be necessary to carry out the provisions of this title.

### TITLE II—CITY OF ROCKS NATIONAL RESERVE

#### ESTABLISHMENT OF CITY OF ROCKS NATIONAL RESERVE

Sec. 201. (a) There is hereby established the City of Rocks National Reserve (hereinafter referred to as the "reserve"), in order to preserve and protect the significant historical and cultural resources; to manage recreational use; to protect and maintain scenic quality; and to interpret the nationally significant values of the reserve.

(b) The reserve shall include approximately fourteen thousand three hundred and twenty acres as depicted on the map entitled "Boundary Map, City of Rocks National Reserve, Idaho" numbered P30-80,005 and dated October 1987. The map shall be on file in the offices of the National Park Service, Department of the Interior and the Offices of the Governor, State of Idaho.

(c) Within six months after the enactment of this title, the Secretary of the Interior (hereinafter in this title referred to as the

"Secretary") shall file a legal description of the reserve designated under this section with the Committee on Interior and Insular Affairs of the United States House of Representatives and with the Committee on Energy and Natural Resources of the United States Senate. Such legal description shall have the same force and effect as if included in this title, except that the Secretary may correct clerical and typographical errors in such legal description and in the map referred to in subsection (b). The legal description shall be on file and available for public inspection in the offices of the National Park Service, Department of the Interior and the offices of the Governor of the State of Idaho.

#### PLAN AND MANAGEMENT OF RESERVE

SEC. 202. (a) To achieve the purpose of this title, the Secretary, acting through the National Park Service, in cooperation with appropriate State and Federal agencies, local units of government and local residents shall formulate a comprehensive plan for the protection, preservation, and interpretation of the reserve. The plan shall identify those areas or zones within the reserve which would most appropriately be devoted to—

- (1) public use and development;
- (2) historic and natural preservation; and
- (3) private use subject to appropriate local ordinances designed to protect the historic rural setting.

(b) Within eighteen months following the date of enactment of this section, the Secretary shall transmit the plan to the President of the Senate and the Speaker of the House of Representatives and to the Governor of the State of Idaho.

(c) At such time as the State or appropriate units of local government having jurisdiction over land use within the reserve have enacted ordinances or established regulations which in the judgment of the Secretary will protect and preserve the historic and natural features of the area in accordance with the comprehensive plan, the Secretary shall, pursuant to cooperative agreement—

- (1) transfer management and administration over all or any part of the property acquired under subsection (d) of this section to the State or appropriate units of local government;
- (2) provide technical assistance to such State or units of local government in the management, protection, and interpretation of the reserve; and
- (3) make periodic grants, which shall be supplemental to any other funds to which the grantee may be entitled under any other provision of law, to such State or local unit of government to carry out the purposes of this title.

(dx1) The Secretary is authorized to acquire such lands and interests as he determines are necessary to accomplish the purposes of this title by donation, purchase with donated funds, or appropriated funds, or exchange, except that the Secretary may not acquire the fee simple title to any land without the consent of the owner. The Secretary shall, in addition, give prompt and careful consideration to any offer made by an individual owning property within the reserve to sell such property. If such individual notifies the Secretary that the continued ownership of such property is causing, or would result in, undue hardship.

(2) Lands and waters, and interests therein, within the boundaries of the reserve which were administered by the Forest Service.

United States Department of Agriculture or the Bureau of Land Management, Department of the Interior prior to the date of enactment of this title are hereby transferred to the administrative jurisdiction of the Secretary to be administered by the National Park Service in accordance with this title.

(3) Lands and interest therein so acquired shall, so long as responsibility for management and administration remains with the United States, be administered by the Secretary subject to the provisions of the Act of August 25, 1916 (39 Stat. 535), as amended and supplemented, and in a manner consistent with the purpose of this title.

(e) If, after the transfer of management and administration of any lands pursuant to subsection (c) of this section, the Secretary determines that the reserve is not being managed in a manner consistent with the purposes of this title, he shall so notify the appropriate officers of the State or local unit of government to which such transfer was made and provide for a one hundred and eighty-day period in which the transferee may make such modifications in applicable laws, ordinances, rules, and procedures as will be consistent with such purposes. If, upon the expiration of such one hundred and eighty-day period, the Secretary determines that such modifications have not been made or are inadequate, he shall withdraw the management and administration from the transferee and he shall manage such lands in accordance with the provisions of this title.

(f) Congress finds that there are unique circumstances with respect to the water and water related resources within the Reserve designated by this title. The Congress recognizes that the management of this area may be transferred to the State of Idaho, that the State has committed to providing the water necessary to fulfill the purposes of this title, and that there is little or no water or water-related resources that require the protection of a Federal reserved water right. Nothing in this title, nor any action taken pursuant thereto, shall constitute either an express or implied reservation of water or water right for any purpose: *Provided*, That the United States shall retain that reserved water right which is associated with the initial establishment and withdrawal of the national forest lands which will be transferred to the Reserve under this title.

(g) Subject to valid existing rights, Federal lands and interests therein, within the reserve, are hereby withdrawn from disposition under the public land laws and from entry or appropriation under the mining laws of the United States, from the operation of the mineral leasing laws of the United States, and from operation of the Geothermal Steam Act of 1970, as amended.

(h) There is hereby authorized to be appropriated not to exceed \$2,000,000 to carry out the provisions of this title.

### TITLE III—HAGERMAN FOSSIL BEDS NATIONAL MONUMENT

#### ESTABLISHMENT OF HAGERMAN FOSSIL BEDS NATIONAL MONUMENT

SEC. 301. (a) In order to preserve for the benefit and enjoyment of present and future generations the outstanding paleontological sites known as the Hagerman Valley fossil sites, to provide a center for continuing paleontological research, and to provide for the display and interpretation of the scientific specimens uncovered at such sites, there is hereby established the Hagerman Fossil Beds

## ADMINISTRATIVE PROVISIONS

Appropriations for the National Park Service shall be available for the purchase of not to exceed 1 new rotary-wing aircraft for replacement only and 468 passenger motor vehicles, of which 324 shall be for replacement only, including not to exceed 355 for police-type use, 12 buses, and 7 ambulances; to provide, notwithstanding any other provision of law, at a cost not exceeding \$100,000, transportation for children in nearby communities to and from any unit of the National Park System used in connection with organized recreation and interpretive programs of the National Park Service; options for the purchase of land at not to exceed \$1 for each option; and for the procurement and delivery of medical services within the jurisdiction of units of the National Park System: *Provided*, That any funds available to the National Park Service may be used, with the approval of the Secretary, to maintain law and order in emergency and other unforeseen law enforcement situations and conduct emergency search and rescue operations in the National Park System: *Provided further*, That none of the funds appropriated to the National Park Service may be used to process any grant or contract documents which do not include the text of 18 U.S.C. 1913: *Provided further*, That the National Park Service may use helicopters and motorized equipment at Death Valley National Monument for removal of feral burros and horses: *Provided further*, That notwithstanding any other provision of law, the National Park Service may recover all costs of providing necessary services associated with special use permits, such reimbursements to be credited to the appropriation current at that time: *Provided further*, That none of the funds appropriated to the National Park Service may be used to implement an agreement for the redevelopment of the southern end of Ellis Island until such agreement has been submitted to the Congress and shall not be implemented prior to the expiration of 30 calendar days (not including any day in which either House of Congress is not in session because of adjournment of more than three calendar days to a day certain) from the receipt by the Speaker of the House of Representatives and the President of the Senate of a full and comprehensive report on the development of the southern end of Ellis Island, including the facts and circumstances relied upon in support of the proposed project: *Provided further*, That hereafter the Cedar Pass Visitor Center at Badlands National Park, South Dakota, shall be known as the Ben Reifel Visitor Center: *Provided further*, That Federal funds available to the National Park Service may be used for improvements to the National Park Service rail excursion line between Milepost 132.7 and 100.5 located in Northeastern, Pennsylvania: *Provided further*, That with respect to lands and waters under the jurisdiction of the Secretary of the Interior within the City of Rocks National Reserve established by title II of Public Law 100-696, the Secretary shall hereafter permit hunting in accordance with the otherwise applicable laws of the United States and the State of Idaho, except that he may designate zones where and periods when no hunting may be permitted for reasons of public safety, administration, floral and faunal protection and management, or public use and enjoyment: *Provided further*, That except in emergencies, any regulation prescribing such restrictions shall be put into effect only after consultation with the appropriate State agency having jurisdiction over hunting activities: *Provided further*, That with respect to lands and waters under the jurisdiction of the Secretary within the Hagerman Fossil Beds National Monument, established by title III of Public Law 100-696, the Secretary shall hereafter permit hunting and fishing as well as maintenance of structures necessary to undertake such activities, including but not limited to duck and goose blinds on those lands within an area fifty feet in elevation above the high water level of the Snake River in accordance with otherwise applicable laws of the United States and the State of Idaho.

Reports.

Federal  
buildings and  
facilities.  
16 USC 441 note.16 USC 460yy-1  
note.Regulations,  
Effective date.

16 USC 431 note.

**APPENDIX B**  
**REQUEST FOR PERMISSION TO BOLT**  
**City of Rocks National Reserve**

**I. Applicant Information**

Name\_\_\_\_\_

Signature\_\_\_\_\_

Mailing Address\_\_\_\_\_

Date of Birth\_\_\_\_\_

Telephone numbers: (work)\_\_\_\_\_ (home)\_\_\_\_\_

**II. Proposal**

Purpose of Request (check one)

New Route\_\_\_\_\_ Bolt Replacement\_\_\_\_\_ Bolt Addition\_\_\_\_\_

Location of Route: (map attached\_\_\_\_\_)

Area\_\_\_\_\_ Rock\_\_\_\_\_ Route\_\_\_\_\_

If new route, describe location as specifically as possible.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Estimated Time Required\_\_\_\_\_

Total Number of bolts to be placed \_\_\_\_\_

Equipment to be installed\_\_\_\_\_

Equipment (other than drill) to be used\_\_\_\_\_

**III. Map and/or Illustration**

A request for permission to bolt must be accompanied by a diagram or photograph which clearly illustrates the applicant's proposal. A map should also be included if the area is difficult to locate. The diagram must include the numbers and approximate locations of holes to be drilled.

Applicant's Signature\_\_\_\_\_ Date\_\_\_\_\_

**FIELD EVALUATION WORKSHEET**

|                                    |  |
|------------------------------------|--|
| Date of Field Review               |  |
| Land Ownership Involved            |  |
| Management Zone                    |  |
| Type & Level of Use in Area        |  |
| Type & Level of Use on Route       |  |
| Proximity to Other Climbs          |  |
| Route Features & Length            |  |
| Trailhead & Route Proximity        |  |
| Approach Trail                     |  |
| Staging Area                       |  |
| Descent Route                      |  |
| Existing Fixed Anchors             |  |
| Potential for Removable Protection |  |
| Geology & Surface Condition        |  |
| Vegetation Present & Condition     |  |
| Wildlife Habitat or Presence       |  |
| Area Slope, Soils, Erodability     |  |
| Conflicting Uses or Values         |  |
| Existing Resource Impacts          |  |
| Impact Mitigation Needs            |  |

Notes:

Recommendation:

Prepared by: \_\_\_\_\_ Date: \_\_\_\_\_

Title: \_\_\_\_\_

## REQUEST FOR PERMISSION TO BOLT

### City of Rocks National Reserve

An individual requesting permission to use a rock drill for the purpose of installing new bolts or replacing existing bolts for use as rock climbing anchors on public lands within the Reserve must submit a request in writing to the Superintendent, City of Rocks National Reserve, Almo, Idaho, and abide by all of the terms and conditions specified herein. Once a request is received, a field review will be conducted by a qualified members of the City of Rocks National Reserve Staff, or a designated representative, and a determination will be made within 30 days.

The management of City of Rocks National Reserve recognizes that, in some instances, the use of bolts may be appropriate in the interest of resource protection and public safety. However, it is the intent of management to discourage the further proliferation of bolts at City of Rocks National Reserve, as well as the associated impacts resulting from them. Requests for the installation of new bolted climbs will be very closely scrutinized to assure the careful management of resources, values and visitor opportunities. The permission to bolt at the specified sites is based on the finding that the effect of the activity will not result in significant impact to the cultural, natural or scenic resources and values within the National Reserve.

It should also be noted that pursuant to Cassia County Ordinance 91-10-1, the use of a power drill is prohibited within City of Rocks National Reserve without the written permission of the managing agency of the land or the appropriate private property owner.

A record of the field evaluation, providing the basis for approval or denial for each request, is on file in this office. A copy is available at the applicant's request.

#### Terms and Conditions:

- 1) Permission is granted to \_\_\_\_\_ exclusively.
- 2) Permission applies only to those sites specifically listed here and described in the request dated \_\_\_\_\_.
- 3) The date and time that the work will be performed must be scheduled in advance with the City of Rocks National Reserve Climbing Ranger to allow for inspection of work in progress.
- 4) Postponement or cancellation of this privilege must be reported to the City of Rocks Climbing Ranger.
- 5) Approximate locations, make and type, and numbers of bolts to be placed must be determined prior to initiating any drilling.
- 6) Hardware will be painted prior to installation to closely match the color of the surrounding stone.

7) Gluing or chipping rock to create, augment, or reinforce holds, or other practices such as forcibly prying off rock or destroying vegetation to enhance a route are prohibited.

8) Permission to bolt may be revoked at any time should circumstances arise which indicate the need for reevaluation or rescheduling.

It is to be expressly understood that neither the Idaho Department of Parks and Recreation nor the National Park Service, are to be held responsible for the soundness or serviceability of any hardware installed on the rock; the quality or location of any hole drilled to accommodate such hardware; the natural or manmade hazards which may be present at any of the sites; or the future inspection or maintenance of the climbing routes or associated hardware.

#### Waiver and Acknowledgment of Risk:

I understand that rock climbing activities are inherently hazardous. While exercising the privilege which has been granted by the City of Rocks National Reserve, my heir and I agree to release from liability and hold harmless the Idaho Department of Parks and Recreation and the National Park Service from any accidental injury or death that I may incur while exercising this privilege.

I wish to make it expressly understood that my request for permission to bolt was based on my own desire and I will not be carrying out the activity as an agent of the state or federal government. I understand that though I have been granted permission to bolt, I am not obligated to exercise this privilege.

Signed,

Applicant signature: \_\_\_\_\_ Date: \_\_\_\_\_

\_\_\_\_\_  
City of Rocks National Reserve Superintendent Signature Date: \_\_\_\_\_



## APPENDIX C

### GLOSSARY OF CLIMBING TERMS

"Anchors." See "Protection."

"Belay" or belaying" refers to the method by which one climber secures the rope should the other climber fall. Typically, one climber (the "belayer") remains on the ground and belays" the other climber (the "leader") while he or she ascends the rock and places protection. Once the leader reaches the top, he or she then belays the other climber up the route. The rope which serves as a safety line while climbing, is usually fed through a device controlled by the belayer and which provides friction needed to "catch a fall"

"Bolts" or "bolting." See "Expansion bolts."

"Cammings devices" are mechanical devices, typically spring-loaded, used for protection. They are designed to expand once placed in a crack and are removed by manually retracting the spring. "Friends" and "Camalots" are brand names of certain camming devices.

"Carabiners " are aluminum-alloy snap-links used to connect protection to the climber's rope.

"Chains" See "Slings"

"Chalk" typically consists of white-colored magnesium carbonate that is used by climbers to dry sweaty hands and increase adhesion. It is pulverized and carried in a hand-sized bag which is carried during the climb. The residue depends on the climate, type of rock, and other environmental factors.

"Chockstones" or "nuts" are typically made of aluminum alloy in various shapes, the most common being a trapezoid, with sizes ranging from 1/16th of an inch to eight inches in width. A chockstone is attached to a sling or cable capable of accommodating a carabiner. Chockstones are designed to be placed and removed by hand in the natural constrictions formed by cracks with irregular widths. Because chockstones are manipulated by hand, there is usually no damage to the rock in their use unless the rock is fragile.

"Clean Climbing" is a climbing method which uses no fixed protection to ascent a route. Only removable protection such as nuts and camming devices are used and then removed. Clean climbing causes little or no impact to the rock.

"Climbing community" refers to all climbers in general

"Expansion bolts" are two- to four-inch-long metal rods that are typically threaded on one end and machined on the other end so that the end expands with great force when the rod is either twisted or hammered into a drilled hole. The installation of these devices is known as "bolting". After the bolt is placed in a hole in this fashion, a "hanger" can be secured to the threaded end by use of a nut. Some varieties of bolts have hangers or eyes that are permanently pre-attached.

"Fixed protection" or "fixed anchor" is permanently placed protection, typically a bolt or a piton intended to be left in place for use by other climbers. (I.e. "fixed piton").

"Free climbing" is the sole use of the body and physical power to ascend; rope and equipment are used only as a backup should the climber fall.

"Free-Solo climbing" or free soloing is the ascent of a route without a rope or other means of protecting a climber in the event of a fall.

"Hand-placement" of bolts typically involves the use of a masonry bit set in a hand-sized holder and a hammer. The climber uses one hand to hold and twist the holder and bit while hitting the end of the holder with a hammer held by the other hand. The hole is created by percussion, and consequently may take up to an hour to drill.

"Hanger" is an "L" shaped piece of metal that is attached to a bolt and which bears an eye or hole capable of accommodating a carabiner. A hanger attached to a placed bolt is usually considered to be as permanent as the bolt.

"Hold Manufacturing" see "Rock Alteration"

"Leading" refers to the act of a climber ("The leader") ascending a route, placing or clipping into protection as he or she ascends and belayed from below by the second climber. The term is used to distinguish a climber ascending a route belayed from above, which involves relatively little risk.

"Natural Protection" is protection that uses the natural attributes of the rock, such as chickenheads. Natural protection does not include any devices which require a hammer to place, such as bolts or pitons. See also "Clean Climbing".

"Nuts." See "Chockstones."

"Pitch" is the distance a lead climber ascends before stopping to belay the second climber's ascent. The distance of a pitch is limited by the length of the rope used and the location of ledges and anchor stations.

"Pitons" are variously sized iron alloy spikes with an eye or hole in which a "carabiner" can be clipped. Pitons are placed in naturally occurring cracks with repeated blows from a hammer. They usually can be removed by hammering the piton from side to side until enough of the surrounding rock is pulverized to allow withdrawal. Pitons are now considered to be permanently placed or "fixed" when placed and used for free climbing.

"Protection" or "anchors" indicate the various devices which a climber places in or on the rock for safety or to descend. The term includes chockstones, camming devices, pitons, and hangers/bolts.

"Rappel" is the method by which a climber descends a rope, usually by using a mechanical device which allows a controlled descent with little effort.

"Rappel-placement" is the placement of protection on rappel from the top of the cliff prior to the first ascent. The term rappel-placed bolts refers to bolts placed in this manner.

"Rating" or "standard of difficulty" is a numerical index (Yosemite Scale) used to indicate the difficulty of free climbing a particular route. The rating or standard is set by the first ascensionist then revised by subsequent parties if necessary. The index ranges from 5.0 to a current maximum of 5.14. (the "5" indicates that the type of climbing is technical free climbing.) Whereas virtually any able-bodied person can climb 5.0 with little practice, only Olympic-caliber trained athletes can climb 5.14.

"Retro-bolting" is the practice of bolting an existing route after the first ascent to make it safer or more convenient to lead.

"Rock Alteration" involves the physical modification of the rock surface and may include filing off rough edges, reinforcing loose hand and foot holds with epoxy, or creating new holds by using tools such as chisels, hammers, or power drills.

"Route" is the vertical path on the rock face which a climber ascends. A route is created when it is first climbed and is usually given a name by the first ascensionist, which is recorded in a guidebook for other climbers to use to find and identify the route.

"Route chopping" is the removal or destruction of fixed protection, typically rappel-placed bolts, on a particular route so that the route no longer can be led. Though chopping occurs infrequently, the motive is usually based on the style or environmental ethical differences between climbers.

"Slings" are knotted loops of nylon webbing that are usually left behind when a climber descends from the top of a route (typically by rappeling or being lowered off by the belayer). Sometimes metal chains are used for the same purpose rather than slings because chains are easier to use once in place and last longer than slings.

"Sport climbing" is a style of climbing typically involving short (less than a rope length) routes with fixed bolt protection. Previewing and practicing a climb is common and the emphasis is on technical difficulty rather than adventure. Climbs tend to involve less physical risk and rarely continue to summits. Routes generally end at top fixed anchors where the sustained difficulty of the climb lessens or the character of the rock changes.

"Technical" refers to the need for a rope and protection devices to ascend a route (5th class climbing). "Technical" is meant to distinguish from climbing in which a rope is needed but protection devices are not (4th class climbing) or climbing in which a rope and protection devices are not needed (3rd class climbing).

"Traditional climbing" is a style of climbing where protection is typically placed by the leader with value placed on unpracticed ascents and higher degrees of personal risk than in sport climbing. The ascents are normally done from the ground to the top of the route and any fall or weighting of the rope generally dictates that the climber be lowered to the ground or stance to restart the climb. Traditional climbing routes are typically protected by artificial chockstones, although in areas with few cracks, belts placed by hand by the leader during the ascent are considered acceptable. Traditional climbs are generally multi-pitch climbs and summits are common objectives.

## APPENDIX D

### ENVIRONMENTAL CONSEQUENCES OF IMPLEMENTING THE CLIMBING MANAGEMENT PLAN

The section summarizes the environmental effects of implementing the plan and are taken from the draft Climbing Management Plan, Alternative D.

#### Natural

- Monitoring of the natural resources within the General Natural Area would be intensified. Resources determined to be vulnerable to adverse impacts by climbing activities would be protected.
- Potential climber-induced impacts to historic features (inscription rocks, Twin Sisters) would be avoided by authorized closures.
- Soil erosion and vegetation damage on and near Twin Sisters, due to climbing use, would subside. In many cases, areas would naturally revegetate.
- Soil erosion and vegetation damage near inscription rocks may increase due to an increase in visitors viewing the inscriptions.
- Care must be taken to prevent damage to rock surfaces when fixed anchors are removed from inscription rocks.
- The direct and indirect impacts associated with additional bolt proliferation would be diminished due to restrictions on the use of both power and manual drills (rock damage, soil and vegetation disturbance on and off rock, aesthetic and experiential impacts, etc.).
- Direct and indirect impacts relating to route development and bolt removal may be reduced by reaffirming existing regulations (rock damage, soil and vegetation disturbance on and off rock, aesthetic and experiential impacts, etc.).
- Soil erosion, vegetation damage and associated water quality degradation should be reduced due to higher maintenance standards in the Natural and Recreational Resource Area as implemented by park staff..
- Potential or existing natural resource impacts may be reduced Reserve-wide due to climber commitment to a climber education program.
- Potential disruption and disturbance of nesting raptors due to climbing activities on and around rock summits would be mitigated by monitoring and seasonal closures where necessary.

#### Cultural

- Significant features included in the National Historic Landmark would be protected from any potential direct or indirect impact from rock climbing (i.e. physical, aesthetic or experiential impacts).

- The preservation of the historic inscriptions and the integrity of the register rocks would benefit from the elimination of climbing and the removal or camouflaging of remaining hardware
- The foreground views of the California Trail would be protected from the potential visual impact of viewing climbers in the historic scene
- Impacts to the cultural integrity of the Twin Sister formation, attributed to rock climbing activities on the two spires, would be eliminated by prohibiting climbing

#### Socio-economic

- Fixed climbing anchors would remain on Twin Sisters but would continue to be unnoticeable to other visitors in the historic zone.
- Camouflaging would reduce visual impact of hardware on the register rocks.
- Chalk residue on Twin Sisters and the inscription rocks would disappear due to natural weathering.
- The potential impact of seeing climbers in the California Trail zone would be avoided due to restrictions in the foreground viewshed and the prohibition of climbing on inscription rocks.
- Continued funding and staffing for climbing management would be necessary to successfully implement the proposed action
- Increased funding and resources would be necessary to provide monitoring, trail maintenance, facilities, signing and educational materials as proposed.
- Special conditions for commercial guiding could have beneficial effects by requiring that environmental education and climbing safety be integrated into every guiding or instructional session.
- The proposed action would benefit relations with private landowners by clarifying areas of public land ownership and reaffirming the prohibition of entering private property, unless waived by the private landowner.
- Prohibition of climbing on Twin Sisters would adversely affect the climbing community. Through restricting public recreational climbing use of this feature, some ongoing partnerships between Reserve staff and the climbing community could be impacted by this action. This would be partially mitigated by the accessibility of other numerous rock formations within the Reserve that are open to climbing use and the potential of opening additional areas to public use in the future.